

## APPENDIX B

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### Calculations of Site-Specific Background Concentrations of Metals in Soil

## **APPENDIX B**

### **SITE-SPECIFIC BACKGROUND CONCENTRATIONS OF METALS IN SOIL**

Former Pechiney Cast Plate, Inc. Facility  
3200 Fruitland Avenue  
Vernon, California

#### **1.0 INTRODUCTION**

Naturally-occurring inorganic constituents (i.e., metals) detected in soil at a site may be eliminated as chemicals of potential concern (COPCs) if detected concentrations are consistent with local or site-specific background conditions (also referred to as “ambient conditions,” or conditions unaffected by past site-related activities). The derivation of local or site-specific background concentrations may also be used to evaluate if remedial action or risk management measures specific to metals in soil is warranted. Because of the high density of industrial land use surrounding the former Pechiney Cast Plate, Inc. Facility (the Site), collecting soil samples to establish local background concentrations would not be appropriate or applicable to the Site. Instead, site-specific background concentrations of metals in soil were derived for the Site from on-site data as described herein. The analysis presented has been prepared in accordance with several California Environmental Protection Agency (Cal-EPA) Department of Toxic Substances Control (DTSC) guidance documents including:

- Selecting Inorganic Constituents as Chemicals of Potential Concern at Risk Assessments at Hazardous Waste Sites and Permitted Facilities, February 1997 (DTSC, 1997);<sup>1</sup> and
- Arsenic Strategies, Determination of Arsenic Remediation, Development of Arsenic Cleanup Goals, January 16, 2009 (DTSC, 2009).<sup>2</sup>

Information regarding the lithology of the Site, along with a description of the previous on-site investigations for metals in soil, is presented in Sections 2.0 through 3.0 of the Feasibility Study (FS). The metals data collected from these previous investigations and evaluated for use in the derivation of site-specific background concentrations are presented in Appendix A

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<sup>1</sup> Department of Toxic Substances Control (DTSC), 1997, Selecting Inorganic Constituents as Chemicals of Potential Concern at Risk Assessment at Hazardous Waste Sites and Permitted Facilities, February.

<sup>2</sup> Department of Toxic Substances Control (DTSC), 2009, Arsenic Strategies, Determination of Arsenic Remediation, Development Arsenic Cleanup Goals, January 16.

of the FS. A description of the approach and methods used to derive the site-specific background concentrations is presented in the following sections.

## **2.0 DATA EVALUATION**

As presented in Appendix A of the FS, 486 soil samples were collected from the ground surface to a depth of 50 feet below ground surface (bgs) at the Site between 1991 and 2007 and analyzed for metals using U.S. EPA Method 6010B or U.S. EPA Method 7471A (for mercury). Of these 486 soil samples, 249 soil samples are no longer in place following excavations (marked as “Excavated” in Appendix A). Only the analytical results from the 237 “left-in-place” soil samples were considered for the evaluation of background conditions. Summary statistics for the analytical results of these samples are presented in Table B-1.

Metals with low frequency of detection were excluded from the evaluation of site-specific background. Specifically, antimony, beryllium, cadmium, hexavalent chromium, molybdenum, selenium, silver, and thallium were excluded, with detection frequencies between 0 and 6 percent. The detection frequencies for the remaining 10 metals detected at the Site (arsenic, barium, total chromium, cobalt, copper, lead, mercury, nickel, vanadium, and zinc) were considered sufficient to warrant statistical and graphical evaluation.

Detection limits were not available for two non-detect results of lead for samples UST-2B-1 and UST-2B-2 collected in 1995. The non-detect results were simply listed as ND in the provided data tables associated with the removal of the underground storage tanks (laboratory reports for these samples were not available). These non-detect results were therefore excluded from the subsequent statistical evaluations.

## **3.0 SITE-SPECIFIC BACKGROUND CONCENTRATIONS**

The statistical and graphical methods applied to evaluate and identify site-specific background concentrations for metals in soil included a goodness-of-fit and probability plots. First, each metal was evaluated using goodness-of-fit tests and probability plots to determine if single or multiple data populations exist within each dataset. Gaps or inflection points identified from the probability plots, for example, would be indicative of a shift from background concentrations to site-related concentrations (DTSC, 1997). For those metals for which inflection points could not be identified but for which the goodness-of-fit tests suggested multiple data populations were present, additional statistical evaluations were performed to identify outliers (impacted soil samples) and estimate site-specific background concentrations.

### 3.1 DISTRIBUTION EVALUATION AND IDENTIFICATION OF INFLECTION POINTS

Consistent with DTSC guidance (DTSC, 1997), the distribution of each dataset was evaluated to determine if multiple distributions were present. Distributions were tested using the Lilliefors's goodness-of-fit test function in U.S. EPA's ProUCL product, Version 4.00.04 (ProUCL) (U.S. EPA, 2009)<sup>3</sup> and were also evaluated graphically with normal and lognormal probability plots generated using ProUCL. Dataset distributions that fail goodness-of-fit tests for normality and lognormality and/or the presence of inflection points in a probability plot generally indicate that a dataset is comprised of multiple populations (DTSC, 1997). In these cases, background conditions are defined as the range of concentrations associated with the population nearest the origin (i.e., the first population) (DTSC, 1997; 2009).

The results of the goodness-of-fit testing for each metal are presented in Attachment B-1. As shown, only one dataset was considered to fit a normal, lognormal, or gamma theoretical distribution; the distribution of the mercury data set was determined to fit a lognormal distribution, but only when excluding the non-detect results. Therefore, it is likely that the datasets of all 10 metals evaluated are comprised of both background and site-related data populations.

Normal and lognormal probability plots are presented for each metal in Attachment B-2. Detection limits ranged widely from samples collected and analyzed during the 1990s to more recent analytical results. For example, the detection limits for non-detect results of arsenic ranged from 0.05 milligrams per kilogram (mg/kg) to 60 mg/kg (for two samples, H-1 and H-2; Appendix A). The presence of multiple non-detect results within the range of detected concentrations created "noise" within some of the probability plots. To aid in the identification of distribution types and possible gaps or inflection points, normal and lognormal probability plots were also prepared by excluding these non-detect results.

Inflection points were identified for the following metals from the various probability plots (Attachment B-2):

- Arsenic – Inflection point at 9.9 mg/kg, based on the normal probability plot with non-detect results removed;
- Copper – Inflection point at 35 mg/kg, based on the normal probability plot of the complete data set;
- Mercury – Inflection point at 0.18 mg/kg, based on the normal or lognormal probability plots with non-detect results removed;

- Nickel – Inflection point at 17 mg/kg, based on the normal probability plots for the complete data set or with the non-detect results removed; and
- Zinc – Inflection point at 92 mg/kg, based on the normal probability plot of the complete data set.

These inflection points were identified as the site-specific background concentrations for these metals, with one exception. As the inflection point for arsenic, 9.9 mg/kg, was in agreement with a 10 mg/kg background concentration previously established by the City of Vernon using comparable graphical methods (City of Vernon H&EC, letter dated April 28, 2008),<sup>4</sup> 10 mg/kg was used as the site-specific background concentration for arsenic at the Site.

Inflection points were not identified from the probability plots for barium, total chromium, cobalt, lead, or vanadium that would potentially distinguish background from site-related data populations. As a result, the datasets for these metals were subjected to further statistical evaluations to estimate site-specific background concentrations as described in Section 3.2.

### **3.2 OUTLIER EVALUATION AND ESTIMATION OF UPPER LIMITS**

Because inflection points could not be identified from the probability plots for barium, total chromium, cobalt, lead, and vanadium, upper limit concentrations were quantitatively estimated as representative of site-specific background concentrations. Each dataset was first evaluated for potential outliers. Outliers should be removed prior to estimating an upper limit concentration to ensure the upper limit estimate is not overly influenced by one or two observations, but “conforms to the pattern established by the majority of values in the dataset” (DTSC, 2009). Rosner’s test was applied with ProUCL to qualitatively test for the presence of outliers (see Attachment B-3). Outliers were identified in the total chromium, lead, and vanadium background datasets and were excluded from their respective datasets prior to estimating the upper limit concentrations. The outliers identified by Rosner’s test are depicted in the probability plots in Attachment B-2.

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<sup>3</sup> U.S. EPA, 2009, ProUCL Version 4.00.04, Technical Guide, Office of Research and Development, Washington DC, April.

<sup>4</sup> City of Vernon Health & Environmental Control, 2008, letter to Ms. Linda Conlan re: Comments on Revised Geomatrix Feasibility Study/Remedial Action Plan (FS/RAP), Former Pechiney Cast Plate, Inc. Facility, 3200 Fruitland Avenue, Vernon, California, April 28.

With the suspected outliers removed, the upper limit concentrations for barium, total chromium, cobalt, lead, and vanadium were estimated using the following equation (DTSC, 2009):

$$UL = x\_bar + K * sd \quad (1)$$

Where:

|       |   |   |
|-------|---|---|
| UL    | = | the upper limit of the dataset  |
| x_bar | = | the mean of detected concentrations in the dataset  |
| K     | = | statistical tolerance factor for estimating an upper confidence limit on a given percentile of the population |
| *     | = | multiply  |
| sd    | = | the standard deviation of the mean  |

The value of the statistical tolerance factor was determined from a table in Gilbert (1987)<sup>5</sup> based on sample size, upper confidence limit, and quantile of the data population. As defined by DTSC (DTSC, 2009), the 95 percent upper confidence limit on the 99<sup>th</sup> quantile of each dataset was estimated for each metal, using a statistical tolerance factor based on data population parameters. The calculation of the upper limit concentrations of background is presented in Table B-2 for barium, total chromium, cobalt, lead, and vanadium.

### 3.3 SUMMARY OF SITE-SPECIFIC BACKGROUND CONCENTRATIONS

A summary of the site-specific background concentrations for metals at the Site, identified as inflection points from normality plots or quantified as upper limit concentrations from background populations, is presented in Table B-3.

<sup>5</sup> Gilbert, R.O., 1987, *Statistical Methods for Environmental Pollution Monitoring*. Van Nostrand Reinhold Co., New York.

TABLE B-1

SUMMARY STATISTICS OF ANALYTICAL RESULTS FOR METALS  
Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

Results are shown in milligrams per kilogram (mg/kg)

| Sample Date                            | Antimony | Arsenic | Barium | Beryllium | Cadmium | Chromium,<br>Hexavalent | Chromium,<br>Total | Cobalt | Copper | Lead | Mercury | Molybdenum | Nickel | Selenium | Silver | Thallium | Vanadium | Zinc |
|--|----------|---------|--------|-----------|---------|-------------------------|--------------------|--------|--------|------|---------|------------|--------|----------|--------|----------|----------|------|
| Count                                  | 217      | 216     | 217    | 217       | 217     | 23                      | 219                | 217    | 219    | 221  | 217     | 217        | 217    | 217      | 217    | 217      | 217      | 217  |
| Number of Detects                      | 0        | 147     | 217    | 0         | 13      | 1                       | 219                | 203    | 219    | 186  | 61      | 2          | 208    | 2        | 1      | 4        | 217      | 217  |
| Number of Non-Detects                  | 217      | 69      | 0      | 217       | 204     | 22                      | 0                  | 14     | 0      | 35   | 156     | 215        | 9      | 215      | 216    | 213      | 0        | 0    |
| Mean Detected Concentration            | NA       | 5.0     | 92.3   | NA        | 1.25    | 0.35                    | 12.9               | 8.0    | 20.3   | 9.4  | 0.12    | 6          | 9.6    | 1.41     | 5      | 1.24     | 32.5     | 58.0 |
| Median Concentration                   | NA       | 1.9     | 93.9   | NA        | NA      | NA                      | 13                 | 8      | 17     | 2.8  | NA      | NA         | 9.3    | NA       | NA     | NA       | 34.0     | 51.0 |
| Standard Deviation of Detections       | NA       | 13.0    | 33.1   | NA        | 0.66    | NA                      | 4.8                | 2.4    | 23.6   | 18.7 | 0.14    | 1.41       | 3.5    | 1.12     | NA     | 0.61     | 9.6      | 52.1 |
| Coefficient of Variation of Detections | NA       | 2.6     | 0.4    | NA        | 0.53    | NA                      | 0.37               | 0.30   | 1.2    | 2.0  | 1.21    | 0.24       | 0.36   | 0.79     | NA     | 0.49     | 0.30     | 0.9  |
| Minimum Detection                      | 0        | 0.63    | 23     | 0         | 0.54    | 0.35                    | 2.7                | 2.2    | 3.3    | 0.62 | 0.023   | 5          | 2.4    | 0.62     | 5      | 0.74     | 7.6      | 13.3 |
| Maximum Detection                      | 0        | 120     | 190    | 0         | 2.8     | 0.35                    | 32.1               | 16     | 257    | 157  | 0.98    | 7          | 27     | 2.2      | 5      | 2.1      | 70       | 607  |
| Minimum Reporting Limit                | 5        | 0.05    | 0      | 0.5       | 0.5     | 0.04                    | 0                  | 3      | 0      | 3    | 0.02    | 4          | 3      | 0.5      | 1      | 0.5      | 0        | 0    |
| Maximum Reporting Limit                | 12       | 60      | 0      | 1         | 1       | 0.04                    | 0                  | 10     | 0      | 20   | 0.1     | 8          | 4      | 1        | 2      | 100      | 0        | 0    |
| Detection Frequency                    | 0%       | 68%     | 100%   | 0%        | 6%      | 4%                      | 100%               | 94%    | 100%   | 84%  | 28%     | 1%         | 96%    | 1%       | 0.5%   | 2%       | 100%     | 100% |

Abbreviations:  
NA = not applicable

**TABLE B-2**

**CALCULATION OF UPPER LIMIT CONCENTRATIONS**

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

Results are shown in milligrams per kilogram (mg/kg)

|                                     | Barium     | Chromium, Total | Cobalt      | Lead        | Vanadium    |
|-------------------------------------|------------|-----------------|-------------|-------------|-------------|
| <b><i>First Population</i></b>      |            |                 |             |             |             |
| Number of Detections                | 217        | 218             | 203         | 185         | 216         |
| Number of Outliers                  | 0          | 1 (32.1)        | 0           | 1 (157)     | 1 (70)      |
| Mean Detection                      | 92.3       | 12.9            | 7.95        | 8.59        | 32.3        |
| Standard Deviation of Detections    | 33.1       | 4.63            | 2.35        | 15.3        | 9.25        |
| K                                   | 2.62       | 2.62            | 2.62        | 2.62        | 2.62        |
| UL <sub>95</sub> (X <sub>99</sub> ) | <b>179</b> | <b>25</b>       | <b>14.1</b> | <b>48.5</b> | <b>56.5</b> |

Abbreviations:

K = statistical tolerance factor (from Gilbert, 1987).

UL<sub>95</sub>(X<sub>99</sub>) = 95 percent upper limit for the 99th quantile.

Equations:

$$UL_{95}(X_{99}) = \bar{x} + K * sd$$



**TABLE B-3**

**SUMMARY OF SITE-SPECIFIC BACKGROUND CONCENTRATIONS FOR METALS**

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

Results are shown in milligrams per kilogram (mg/kg)

| <b>Metal</b>           | <b>Site-Specific Background Concentration</b> | <b>Basis</b>                  |
|------------------------|---|-------------------------------|
| <b>Arsenic</b>         | 10  | Inflection Point <sup>1</sup> |
| <b>Barium</b>          | 179   | Upper Limit Concentration     |
| <b>Chromium, Total</b> | 25  | Upper Limit Concentration     |
| <b>Cobalt</b>          | 14.1  | Upper Limit Concentration     |
| <b>Copper</b>          | 35  | Inflection Point              |
| <b>Lead</b>            | 48.5  | Upper Limit Concentration     |
| <b>Mercury</b>         | 0.18  | Inflection Point              |
| <b>Nickel</b>          | 17  | Inflection Point              |
| <b>Vanadium</b>        | 56.5  | Upper Limit Concentration     |
| <b>Zinc</b>            | 92  | Inflection Point              |

Notes:

1. As the inflection point for arsenic, 9.9 mg/kg, was in agreement with a 10 mg/kg background concentration previously established by the City of Vernon using comparable graphical methods (City of Vernon H&EC, letter dated April 28, 2008); 10 mg/kg was used as the site-specific background concentration for arsenic at the Site.

## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

## Arsenic

|   | Num Obs | Num Miss | Num Valid | Detects  | NDs      | % NDs  |
|---|---------|----------|-----------|----------|----------|--------|
| Raw Statistics                              | 216     | 0        | 216       | 147      | 69       | 0.3194 |
|   | Number  | Minimum  | Maximum   | Mean     | Median   | SD     |
| Statistics (Non-Detects Only)               | 69      | 0.05     | 60        | 15.92    | 1        | 16.5   |
| Statistics (Detects Only)                   | 147     | 0.63     | 120       | 4.982    | 2.5      | 13.01  |
| Statistics (All: NDs treated as DL value)   | 216     | 0.05     | 120       | 8.477    | 2.5      | 15.08  |
| Statistics (All: NDs treated as DL/2 value) | 216     | 0.025    | 120       | 5.934    | 2.5      | 11.77  |
| Statistics (Normal ROS Estimated Data)      | 216     | -21.89   | 120       | 1.761    | 2.15     | 12.74  |
| Statistics (Gamma ROS Estimated Data)       | 216     | 1E-09    | 120       | 4.507    | 2.35     | 11.15  |
| Statistics (Lognormal ROS Estimated Data)   | 216     | 0.185    | 120       | 3.878    | 2.103    | 10.89  |
|   | K Hat   | K Star   | Theta Hat | Log Mean | Log Stdv | Log CV |
| Statistics (Detects Only)                   | 0.947   | 0.937    | 5.263     | 0.992    | 0.789    | 0.795  |
| Statistics (NDs = DL)                       | 0.598   | 0.593    | 14.17     | 1.104    | 1.364    | 1.236  |
| Statistics (NDs = DL/2)                     | 0.676   | 0.67     | 8.777     | 0.882    | 1.364    | 1.546  |
| Statistics (Gamma ROS Estimates)            | 0.173   | 0.174    | 26.03     | --       | --       | --     |
| Statistics (Lognormal ROS Estimates)        | --      | --       | --        | 0.671    | 0.944    | 1.407  |

## Normal Distribution Test Results

|                                   | No NDs     | NDs = DL     | NDs = DL/2                  | Normal ROS |
|-----------------------------------|------------|--------------|-----------------------------|------------|
| Correlation Coefficient R         | 0.491      | 0.728        | 0.646                       | 0.728      |
|                                   | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |
| Lilliefors (Detects Only)         | 0.414      | 0.0731       | Data Not Normal             |            |
| Lilliefors (NDs = DL)             | 0.378      | 0.0603       | Data Not Normal             |            |
| Lilliefors (NDs = DL/2)           | 0.324      | 0.0603       | Data Not Normal             |            |
| Lilliefors (Normal ROS Estimates) | 0.287      | 0.0603       | Data Not Normal             |            |

## Gamma Distribution Test Results

|  | No NDs     | NDs = DL     | NDs = DL/2                  | Gamma ROS |
|--|------------|--------------|-----------------------------|-----------|
| Correlation Coefficient R              | 0.729      | 0.938        | 0.879                       | 0.925     |
|  | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |           |
| Anderson-Darling (Detects Only)        | 20.47      | 0.786        | Data Not Gamma Distributed  |           |
| Kolmogorov-Smirnov (Detects Only)      | 0.308      | 0.0798       | Data Not Gamma Distributed  |           |
| Anderson-Darling (NDs = DL)            | 18.73      | 0.811        | Data Not Gamma Distributed  |           |
| Kolmogorov-Smirnov (NDs = DL)          | 0.277      | 0.0649       | Data Not Gamma Distributed  |           |
| Anderson-Darling (NDs = DL/2)          | 9.118      | 0.804        | Data Not Gamma Distributed  |           |
| Kolmogorov-Smirnov (NDs = DL/2)        | 0.208      | 0.0646       | Data Not Gamma Distributed  |           |
| Anderson-Darling (Gamma ROS Estimates) | 40.75      | 0.968        | Data Not Gamma Distributed  |           |
| Kolmogorov-Smirnov (Gamma ROS Est.)    | 0.382      | 0.0698       | Data Not Gamma Distributed  |           |

## Lognormal Distribution Test Results

|                                      | No NDs     | NDs = DL     | NDs = DL/2                  | Log ROS |
|--------------------------------------|------------|--------------|-----------------------------|---------|
| Correlation Coefficient R            | 0.895      | 0.952        | 0.97                        | 0.963   |
|                                      | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |         |
| Lilliefors (Detects Only)            | 0.187      | 0.0731       | Data Not Lognormal          |         |
| Lilliefors (NDs = DL)                | 0.174      | 0.0603       | Data Not Lognormal          |         |
| Lilliefors (NDs = DL/2)              | 0.125      | 0.0603       | Data Not Lognormal          |         |
| Lilliefors (Lognormal ROS Estimates) | 0.108      | 0.0603       | Data Not Lognormal          |         |

Note: Substitution methods such as DL or DL/2 are not recommended.

## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California**Barium**

|                                     | Num Obs    | Num Miss     | Num Valid                   | Detects    | NDs      | % NDs  |
|-------------------------------------|------------|--------------|-----------------------------|------------|----------|--------|
| Raw Statistics                      | 237        | 20           | 217                         | 217        | 0        | 0.00%  |
|                                     | Number     | Minimum      | Maximum                     | Mean       | Median   | SD     |
| Statistics (Full: no NDs)           | 217        | 23           | 190                         | 92.28      | 93.9     | 33.06  |
|                                     | K Hat      | K Star       | Theta Hat                   | Log Mean   | Log Stdv | Log CV |
| Statistics (Full: no NDs)           | 6.173      | 6.091        | 14.95                       | 4.442      | 0.445    | 0.1    |
| Normal Distribution Test Results    |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Normal ROS |          |        |
| Correlation Coefficient R           | 0.992      | 0.992        | 0.992                       | 0.992      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| Lilliefors (Full: no NDs)           | 0.0772     | 0.0601       | Data Not Normal             |            |          |        |
| Gamma Distribution Test Results     |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Gamma ROS  |          |        |
| Correlation Coefficient R           | 0.968      | 0.968        | 0.968                       | 0.968      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| erson-Darling (Full: no NDs)        | 4.447      | 0.755        |                             |            |          |        |
| rov-Smirnov (Full: no NDs)          | 0.112      | 0.0618       | Data Not Gamma Distributed  |            |          |        |
| Lognormal Distribution Test Results |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Log ROS    |          |        |
| Correlation Coefficient R           | 0.947      | 0.947        | 0.947                       | 0.947      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| Lilliefors (Full: no NDs)           | 0.14       | 0.0601       | Data Not Lognormal          |            |          |        |

**Note: Substitution methods such as DL or DL/2 are not recommended.**

# ATTACHMENT B-1

## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS Former Pechiney Cast Plate, Inc. Facility Vernon, California



### Chromium, Total

|                                     | Num Obs    | Num Miss     | Num Valid                   | Detects    | NDs      | % NDs  |
|-------------------------------------|------------|--------------|-----------------------------|------------|----------|--------|
| Raw Statistics                      | 237        | 18           | 219                         | 219        | 0        | 0.00%  |
|                                     | Number     | Minimum      | Maximum                     | Mean       | Median   | SD     |
| Statistics (Full: no NDs)           | 219        | 2.7          | 32.1                        | 12.95      | 13       | 4.797  |
|                                     | K Hat      | K Star       | Theta Hat                   | Log Mean   | Log Stdv | Log CV |
| Statistics (Full: no NDs)           | 5.491      | 5.419        | 2.358                       | 2.467      | 0.481    | 0.195  |
| Normal Distribution Test Results    |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Normal ROS |          |        |
| Correlation Coefficient R           | 0.981      | 0.981        | 0.981                       | 0.981      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| Lilliefors (Full: no NDs)           | 0.102      | 0.0599       | Data Not Normal             |            |          |        |
| Gamma Distribution Test Results     |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Gamma ROS  |          |        |
| Correlation Coefficient R           | 0.955      | 0.955        | 0.955                       | 0.955      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| erson-Darling (Full: no NDs)        | 7.381      | 0.756        |                             |            |          |        |
| rov-Smirnov (Full: no NDs)          | 0.167      | 0.0616       | Data Not Gamma Distributed  |            |          |        |
| Lognormal Distribution Test Results |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Log ROS    |          |        |
| Correlation Coefficient R           | 0.928      | 0.928        | 0.928                       | 0.928      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| Lilliefors (Full: no NDs)           | 0.195      | 0.0599       | Data Not Lognormal          |            |          |        |

Note: Substitution methods such as DL or DL/2 are not recommended.

## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

Cobalt

|   | Num Obs | Num Miss | Num Valid | Detects  | NDs      | % NDs  |
|---|---------|----------|-----------|----------|----------|--------|
| Raw Statistics                              | 237     | 20       | 217       | 203      | 14       | 6.45%  |
|   | Number  | Minimum  | Maximum   | Mean     | Median   | SD     |
| Statistics (Non-Detects Only)               | 14      | 3        | 10        | 5.286    | 5        | 2.164  |
| Statistics (Detects Only)                   | 203     | 2.2      | 16        | 7.951    | 8.1      | 2.351  |
| Statistics (All: NDs treated as DL value)   | 217     | 2.2      | 16        | 7.779    | 8        | 2.425  |
| Statistics (All: NDs treated as DL/2 value) | 217     | 1.5      | 16        | 7.609    | 8        | 2.636  |
| Statistics (Normal ROS Estimated Data)      | 217     | 2.2      | 16        | 7.717    | 8        | 2.469  |
| Statistics (Gamma ROS Estimated Data)       | 217     | 1.57     | 16        | 7.722    | 8        | 2.484  |
| Statistics (Lognormal ROS Estimated Data)   | 217     | 2.2      | 16        | 7.727    | 8        | 2.443  |
|   | K Hat   | K Star   | Theta Hat | Log Mean | Log Stdv | Log CV |
| Statistics (Detects Only)                   | 8.802   | 8.684    | 0.903     | 2.015    | 0.373    | 0.185  |
| Statistics (NDs = DL)                       | 8.115   | 8.006    | 0.959     | 1.989    | 0.386    | 0.194  |
| Statistics (NDs = DL/2)                     | 6.014   | 5.934    | 1.265     | 1.944    | 0.462    | 0.238  |
| Statistics (Gamma ROS Estimates)            | 7.371   | 7.272    | 1.048     | --       | --       | --     |
| Statistics (Lognormal ROS Estimates)        | --      | --       | --        | 1.981    | 0.388    | 0.196  |

## Normal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Normal ROS |
|---------------------------|--------|----------|------------|------------|
| Correlation Coefficient R | 0.981  | 0.985    | 0.976      | 0.984      |

|                                   | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|-----------------------------------|------------|--------------|-----------------------------|
| Lilliefors (Detects Only)         | 0.1        | 0.0622       | Data Not Normal             |
| Lilliefors (NDs = DL)             | 0.0945     | 0.0601       | Data Not Normal             |
| Lilliefors (NDs = DL/2)           | 0.117      | 0.0601       | Data Not Normal             |
| Lilliefors (Normal ROS Estimates) | 0.101      | 0.0601       | Data Not Normal             |

## Gamma Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Gamma ROS |
|---------------------------|--------|----------|------------|-----------|
| Correlation Coefficient R | 0.956  | 0.961    | 0.94       | 0.955     |

|  | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|--|------------|--------------|-----------------------------|
| Anderson-Darling (Detects Only)        | 6.774      | 0.752        |                             |
| Kolmogorov-Smirnov (Detects Only)      | 0.155      | 0.0633       | Data Not Gamma Distributed  |
| Anderson-Darling (NDs = DL)            | 6.133      | 0.753        |                             |
| Kolmogorov-Smirnov (NDs = DL)          | 0.148      | 0.0617       | Data Not Gamma Distributed  |
| Anderson-Darling (NDs = DL/2)          | 9.8        | 0.755        |                             |
| Kolmogorov-Smirnov (NDs = DL/2)        | 0.178      | 0.0618       | Data Not Gamma Distributed  |
| Anderson-Darling (Gamma ROS Estimates) | 7.216      | 0.754        |                             |
| Kolmogorov-Smirnov (Gamma ROS Est.)    | 0.157      | 0.0617       | Data Not Gamma Distributed  |

## Lognormal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Log ROS |
|---------------------------|--------|----------|------------|---------|
| Correlation Coefficient R | 0.92   | 0.935    | 0.912      | 0.939   |

|                                      | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|--------------------------------------|------------|--------------|-----------------------------|
| Lilliefors (Detects Only)            | 0.18       | 0.0622       | Data Not Lognormal          |
| Lilliefors (NDs = DL)                | 0.172      | 0.0601       | Data Not Lognormal          |
| Lilliefors (NDs = DL/2)              | 0.202      | 0.0601       | Data Not Lognormal          |
| Lilliefors (Lognormal ROS Estimates) | 0.176      | 0.0601       | Data Not Lognormal          |

Note: Substitution methods such as DL or DL/2 are not recommended.

## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California**Copper**

|                                     | Num Obs    | Num Miss     | Num Valid                   | Detects    | NDs      | % NDs  |
|-------------------------------------|------------|--------------|-----------------------------|------------|----------|--------|
| Raw Statistics                      | 237        | 18           | 219                         | 219        | 0        | 0.00%  |
|                                     | Number     | Minimum      | Maximum                     | Mean       | Median   | SD     |
| Statistics (Full: no NDs)           | 219        | 3.3          | 257                         | 20.31      | 17       | 23.63  |
|                                     | K Hat      | K Star       | Theta Hat                   | Log Mean   | Log Stdv | Log CV |
| Statistics (Full: no NDs)           | 2.41       | 2.38         | 8.427                       | 2.789      | 0.591    | 0.212  |
| Normal Distribution Test Results    |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Normal ROS |          |        |
| Correlation Coefficient R           | 0.608      | 0.608        | 0.608                       | 0.608      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| Lilliefors (Full: no NDs)           | 0.29       | 0.0599       | Data Not Normal             |            |          |        |
| Gamma Distribution Test Results     |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Gamma ROS  |          |        |
| Correlation Coefficient R           | 0.736      | 0.736        | 0.736                       | 0.736      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| erson-Darling (Full: no NDs)        | 8.2        | 0.764        |                             |            |          |        |
| rov-Smirnov (Full: no NDs)          | 0.156      | 0.0621       | Data Not Gamma Distributed  |            |          |        |
| Lognormal Distribution Test Results |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Log ROS    |          |        |
| Correlation Coefficient R           | 0.96       | 0.96         | 0.96                        | 0.96       |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| Lilliefors (Full: no NDs)           | 0.103      | 0.0599       | Data Not Lognormal          |            |          |        |

**Note: Substitution methods such as DL or DL/2 are not recommended.**

## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

Lead

|   | Num Obs | Num Miss | Num Valid | Detects  | NDs      | % NDs  |
|---|---------|----------|-----------|----------|----------|--------|
| Raw Statistics                              | 237     | 18       | 219       | 186      | 33       | 15.07% |
|   | Number  | Minimum  | Maximum   | Mean     | Median   | SD     |
| Statistics (Non-Detects Only)               | 33      | 3        | 20        | 10.18    | 10       | 3.046  |
| Statistics (Detects Only)                   | 186     | 0.62     | 157       | 9.385    | 3.3      | 18.7   |
| Statistics (All: NDs treated as DL value)   | 219     | 0.62     | 157       | 9.505    | 4.2      | 17.27  |
| Statistics (All: NDs treated as DL/2 value) | 219     | 0.62     | 157       | 8.738    | 4.2      | 17.31  |
| Statistics (Normal ROS Estimated Data)      | 219     | -14.19   | 157       | 8.647    | 3.3      | 17.59  |
| Statistics (Gamma ROS Estimated Data)       | 219     | 1E-09    | 157       | 9.218    | 3.5      | 17.48  |
| Statistics (Lognormal ROS Estimated Data)   | 219     | 0.51     | 157       | 8.505    | 3.2      | 17.38  |
|   | K Hat   | K Star   | Theta Hat | Log Mean | Log Stdv | Log CV |
| Statistics (Detects Only)                   | 0.782   | 0.774    | 12        | 1.478    | 1.107    | 0.749  |
| Statistics (NDs = DL)                       | 0.894   | 0.885    | 10.63     | 1.597    | 1.067    | 0.668  |
| Statistics (NDs = DL/2)                     | 0.87    | 0.861    | 10.04     | 1.493    | 1.029    | 0.689  |
| Statistics (Gamma ROS Estimates)            | 0.46    | 0.457    | 20.02     | --       | --       | --     |
| Statistics (Lognormal ROS Estimates)        | --      | --       | --        | 1.41     | 1.07     | 0.759  |

## Normal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Normal ROS |
|---------------------------|--------|----------|------------|------------|
| Correlation Coefficient R | 0.647  | 0.652    | 0.629      | 0.676      |

|                                   | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|-----------------------------------|------------|--------------|-----------------------------|
| Lilliefors (Detects Only)         | 0.32       | 0.065        | Data Not Normal             |
| Lilliefors (NDs = DL)             | 0.303      | 0.0599       | Data Not Normal             |
| Lilliefors (NDs = DL/2)           | 0.319      | 0.0599       | Data Not Normal             |
| Lilliefors (Normal ROS Estimates) | 0.278      | 0.0599       | Data Not Normal             |

## Gamma Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Gamma ROS |
|---------------------------|--------|----------|------------|-----------|
| Correlation Coefficient R | 0.884  | 0.867    | 0.859      | 0.923     |

|  | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|--|------------|--------------|-----------------------------|
| Anderson-Darling (Detects Only)        | 9.753      | 0.794        |                             |
| Kolmogorov-Smirnov (Detects Only)      | 0.187      | 0.0699       | Data Not Gamma Distributed  |
| Anderson-Darling (NDs = DL)            | 7.432      | 0.789        |                             |
| Kolmogorov-Smirnov (NDs = DL)          | 0.142      | 0.0635       | Data Not Gamma Distributed  |
| Anderson-Darling (NDs = DL/2)          | 10.94      | 0.79         |                             |
| Kolmogorov-Smirnov (NDs = DL/2)        | 0.221      | 0.0636       | Data Not Gamma Distributed  |
| Anderson-Darling (Gamma ROS Estimates) | 11.6       | 0.831        |                             |
| Kolmogorov-Smirnov (Gamma ROS Est.)    | 0.2        | 0.0653       | Data Not Gamma Distributed  |

## Lognormal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Log ROS |
|---------------------------|--------|----------|------------|---------|
| Correlation Coefficient R | 0.978  | 0.985    | 0.982      | 0.98    |

|                                      | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|--------------------------------------|------------|--------------|-----------------------------|
| Lilliefors (Detects Only)            | 0.119      | 0.065        | Data Not Lognormal          |
| Lilliefors (NDs = DL)                | 0.0924     | 0.0599       | Data Not Lognormal          |
| Lilliefors (NDs = DL/2)              | 0.135      | 0.0599       | Data Not Lognormal          |
| Lilliefors (Lognormal ROS Estimates) | 0.105      | 0.0599       | Data Not Lognormal          |

Note: Substitution methods such as DL or DL/2 are not recommended.

## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

## Mercury

|   | Num Obs | Num Miss | Num Valid | Detects  | NDs      | % NDs  |
|---|---------|----------|-----------|----------|----------|--------|
| Raw Statistics                              | 237     | 20       | 217       | 61       | 156      | 71.89% |
|   | Number  | Minimum  | Maximum   | Mean     | Median   | SD     |
| Statistics (Non-Detects Only)               | 156     | 0.02     | 0.1       | 0.0964   | 0.1      | 0.0166 |
| Statistics (Detects Only)                   | 61      | 0.023    | 0.98      | 0.119    | 0.084    | 0.143  |
| Statistics (All: NDs treated as DL value)   | 217     | 0.02     | 0.98      | 0.103    | 0.1      | 0.0776 |
| Statistics (All: NDs treated as DL/2 value) | 217     | 0.01     | 0.98      | 0.068    | 0.05     | 0.0823 |
| Statistics (Normal ROS Estimated Data)      | 217     | -0.228   | 0.98      | 0.0402   | 0.0436   | 0.117  |
| Statistics (Gamma ROS Estimated Data)       | 217     | 0.023    | 0.98      | 0.109    | 0.0995   | 0.0802 |
| Statistics (Lognormal ROS Estimated Data)   | 217     | 0.0059   | 0.98      | 0.0651   | 0.0456   | 0.0858 |
|   | K Hat   | K Star   | Theta Hat | Log Mean | Log Stdv | Log CV |
| Statistics (Detects Only)                   | 1.529   | 1.511    | 0.0777    | -2.492   | 0.783    | -0.314 |
| Statistics (NDs = DL)                       | 3.954   | 3.903    | 0.026     | -2.408   | 0.503    | -0.209 |
| Statistics (NDs = DL/2)                     | 2.443   | 2.413    | 0.0278    | -2.906   | 0.564    | -0.194 |
| Statistics (Gamma ROS Estimates)            | 3.871   | 3.821    | 0.0281    | --       | --       | --     |
| Statistics (Lognormal ROS Estimates)        | --      | --       | --        | -3.09    | 0.798    | -0.258 |

## Normal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Normal ROS |
|---------------------------|--------|----------|------------|------------|
| Correlation Coefficient R | 0.739  | 0.59     | 0.556      | 0.904      |

|                                   | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|-----------------------------------|------------|--------------|-----------------------------|
| Lilliefors (Detects Only)         | 0.256      | 0.113        | Data Not Normal             |
| Lilliefors (NDs = DL)             | 0.403      | 0.0601       | Data Not Normal             |
| Lilliefors (NDs = DL/2)           | 0.398      | 0.0601       | Data Not Normal             |
| Lilliefors (Normal ROS Estimates) | 0.108      | 0.0601       | Data Not Normal             |

## Gamma Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Gamma ROS |
|---------------------------|--------|----------|------------|-----------|
| Correlation Coefficient R | 0.895  | 0.67     | 0.706      | 0.798     |

|  | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|--|------------|--------------|-----------------------------|
| Anderson-Darling (Detects Only)        | 2.031      | 0.769        |                             |
| Kolmogorov-Smirnov (Detects Only)      | 0.137      | 0.116        | Data Not Gamma Distributed  |
| Anderson-Darling (NDs = DL)            | 33.32      | 0.757        |                             |
| Kolmogorov-Smirnov (NDs = DL)          | 0.357      | 0.062        | Data Not Gamma Distributed  |
| Anderson-Darling (NDs = DL/2)          | 37.93      | 0.764        |                             |
| Kolmogorov-Smirnov (NDs = DL/2)        | 0.401      | 0.0623       | Data Not Gamma Distributed  |
| Anderson-Darling (Gamma ROS Estimates) | 3.24       | 0.757        |                             |
| Kolmogorov-Smirnov (Gamma ROS Est.)    | 0.103      | 0.062        | Data Not Gamma Distributed  |

## Lognormal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Log ROS |
|---------------------------|--------|----------|------------|---------|
| Correlation Coefficient R | 0.976  | 0.82     | 0.811      | 0.994   |

|                                      | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|--------------------------------------|------------|--------------|-----------------------------|
| Lilliefors (Detects Only)            | 0.0929     | 0.113        | Data Appear Lognormal       |
| Lilliefors (NDs = DL)                | 0.394      | 0.0601       | Data Not Lognormal          |
| Lilliefors (NDs = DL/2)              | 0.37       | 0.0601       | Data Not Lognormal          |
| Lilliefors (Lognormal ROS Estimates) | 0.0413     | 0.0601       | Data Appear Lognormal       |

Note: Substitution methods such as DL or DL/2 are not recommended.



## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

Nickel

|   | Num Obs | Num Miss | Num Valid | Detects  | NDs      | % NDs  |
|---|---------|----------|-----------|----------|----------|--------|
| Raw Statistics                              | 237     | 20       | 217       | 208      | 9        | 4.15%  |
|   | Number  | Minimum  | Maximum   | Mean     | Median   | SD     |
| Statistics (Non-Detects Only)               | 9       | 3        | 4         | 3.444    | 3        | 0.527  |
| Statistics (Detects Only)                   | 208     | 2.4      | 27        | 9.619    | 9.4      | 3.486  |
| Statistics (All: NDs treated as DL value)   | 217     | 2.4      | 27        | 9.363    | 9.3      | 3.63   |
| Statistics (All: NDs treated as DL/2 value) | 217     | 1.5      | 27        | 9.291    | 9.3      | 3.76   |
| Statistics (Normal ROS Estimated Data)      | 217     | 0.503    | 27        | 9.32     | 9.3      | 3.71   |
| Statistics (Gamma ROS Estimated Data)       | 217     | 1E-09    | 27        | 9.318    | 9.3      | 3.719  |
| Statistics (Lognormal ROS Estimated Data)   | 217     | 2.4      | 27        | 9.389    | 9.3      | 3.59   |
|   | K Hat   | K Star   | Theta Hat | Log Mean | Log Stdv | Log CV |
| Statistics (Detects Only)                   | 7.416   | 7.316    | 1.297     | 2.195    | 0.389    | 0.177  |
| Statistics (NDs = DL)                       | 6.251   | 6.168    | 1.498     | 2.155    | 0.428    | 0.199  |
| Statistics (NDs = DL/2)                     | 5.006   | 4.939    | 1.856     | 2.126    | 0.506    | 0.238  |
| Statistics (Gamma ROS Estimates)            | 2.767   | 2.732    | 3.367     | --       | --       | --     |
| Statistics (Lognormal ROS Estimates)        | --      | --       | --        | 2.162    | 0.413    | 0.191  |

## Normal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Normal ROS |
|---------------------------|--------|----------|------------|------------|
| Correlation Coefficient R | 0.972  | 0.975    | 0.978      | 0.979      |

|                                   | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|-----------------------------------|------------|--------------|-----------------------------|
| Lilliefors (Detects Only)         | 0.0863     | 0.0614       | Data Not Normal             |
| Lilliefors (NDs = DL)             | 0.0755     | 0.0601       | Data Not Normal             |
| Lilliefors (NDs = DL/2)           | 0.0704     | 0.0601       | Data Not Normal             |
| Lilliefors (Normal ROS Estimates) | 0.0724     | 0.0601       | Data Not Normal             |

## Gamma Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Gamma ROS |
|---------------------------|--------|----------|------------|-----------|
| Correlation Coefficient R | 0.985  | 0.985    | 0.978      | 0.971     |

|  | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|--|------------|--------------|-----------------------------|
| Anderson-Darling (Detects Only)        | 1.324      | 0.754        |                             |
| Kolmogorov-Smirnov (Detects Only)      | 0.0651     | 0.0628       | Data Not Gamma Distributed  |
| Anderson-Darling (NDs = DL)            | 2.044      | 0.755        |                             |
| Kolmogorov-Smirnov (NDs = DL)          | 0.079      | 0.0618       | Data Not Gamma Distributed  |
| Anderson-Darling (NDs = DL/2)          | 4.226      | 0.756        |                             |
| Kolmogorov-Smirnov (NDs = DL/2)        | 0.103      | 0.0618       | Data Not Gamma Distributed  |
| Anderson-Darling (Gamma ROS Estimates) | 11.78      | 0.762        |                             |
| Kolmogorov-Smirnov (Gamma ROS Est.)    | 0.183      | 0.0622       | Data Not Gamma Distributed  |

## Lognormal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Log ROS |
|---------------------------|--------|----------|------------|---------|
| Correlation Coefficient R | 0.975  | 0.972    | 0.936      | 0.978   |

|                                      | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|--------------------------------------|------------|--------------|-----------------------------|
| Lilliefors (Detects Only)            | 0.0907     | 0.0614       | Data Not Lognormal          |
| Lilliefors (NDs = DL)                | 0.107      | 0.0601       | Data Not Lognormal          |
| Lilliefors (NDs = DL/2)              | 0.136      | 0.0601       | Data Not Lognormal          |
| Lilliefors (Lognormal ROS Estimates) | 0.0991     | 0.0601       | Data Not Lognormal          |

Note: Substitution methods such as DL or DL/2 are not recommended.

# ATTACHMENT B-1

## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California



### Vanadium

|                | Num Obs | Num Miss | Num Valid | Detects | NDs | % NDs |
|----------------|---------|----------|-----------|---------|-----|-------|
| Raw Statistics | 237     | 20       | 217       | 217     | 0   | 0.00% |

|                           | Number | Minimum | Maximum | Mean  | Median | SD    |
|---------------------------|--------|---------|---------|-------|--------|-------|
| Statistics (Full: no NDs) | 217    | 7.6     | 70      | 32.46 | 34     | 9.579 |

|                           | K Hat | K Star | Theta Hat | Log Mean | Log Stdv | Log CV |
|---------------------------|-------|--------|-----------|----------|----------|--------|
| Statistics (Full: no NDs) | 8.983 | 8.862  | 3.613     | 3.423    | 0.368    | 0.107  |

#### Normal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Normal ROS |
|---------------------------|--------|----------|------------|------------|
| Correlation Coefficient R | 0.976  | 0.976    | 0.976      | 0.976      |

|                           | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|---------------------------|------------|--------------|-----------------------------|
| Lilliefors (Full: no NDs) | 0.115      | 0.0601       | Data Not Normal             |

#### Gamma Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Gamma ROS |
|---------------------------|--------|----------|------------|-----------|
| Correlation Coefficient R | 0.952  | 0.952    | 0.952      | 0.952     |

|                                   | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|-----------------------------------|------------|--------------|-----------------------------|
| Anderson-Darling (Full: no NDs)   | 7.894      | 0.753        |                             |
| Kolmogorov-Smirnov (Full: no NDs) | 0.169      | 0.0617       | Data Not Gamma Distributed  |

#### Lognormal Distribution Test Results

|                           | No NDs | NDs = DL | NDs = DL/2 | Log ROS |
|---------------------------|--------|----------|------------|---------|
| Correlation Coefficient R | 0.924  | 0.924    | 0.924      | 0.924   |

|                           | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |
|---------------------------|------------|--------------|-----------------------------|
| Lilliefors (Full: no NDs) | 0.195      | 0.0601       | Data Not Lognormal          |

Note: Substitution methods such as DL or DL/2 are not recommended.

## ProUCL 4.00.04 OUTPUT -- GOODNESS-OF-FIT TESTS

Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

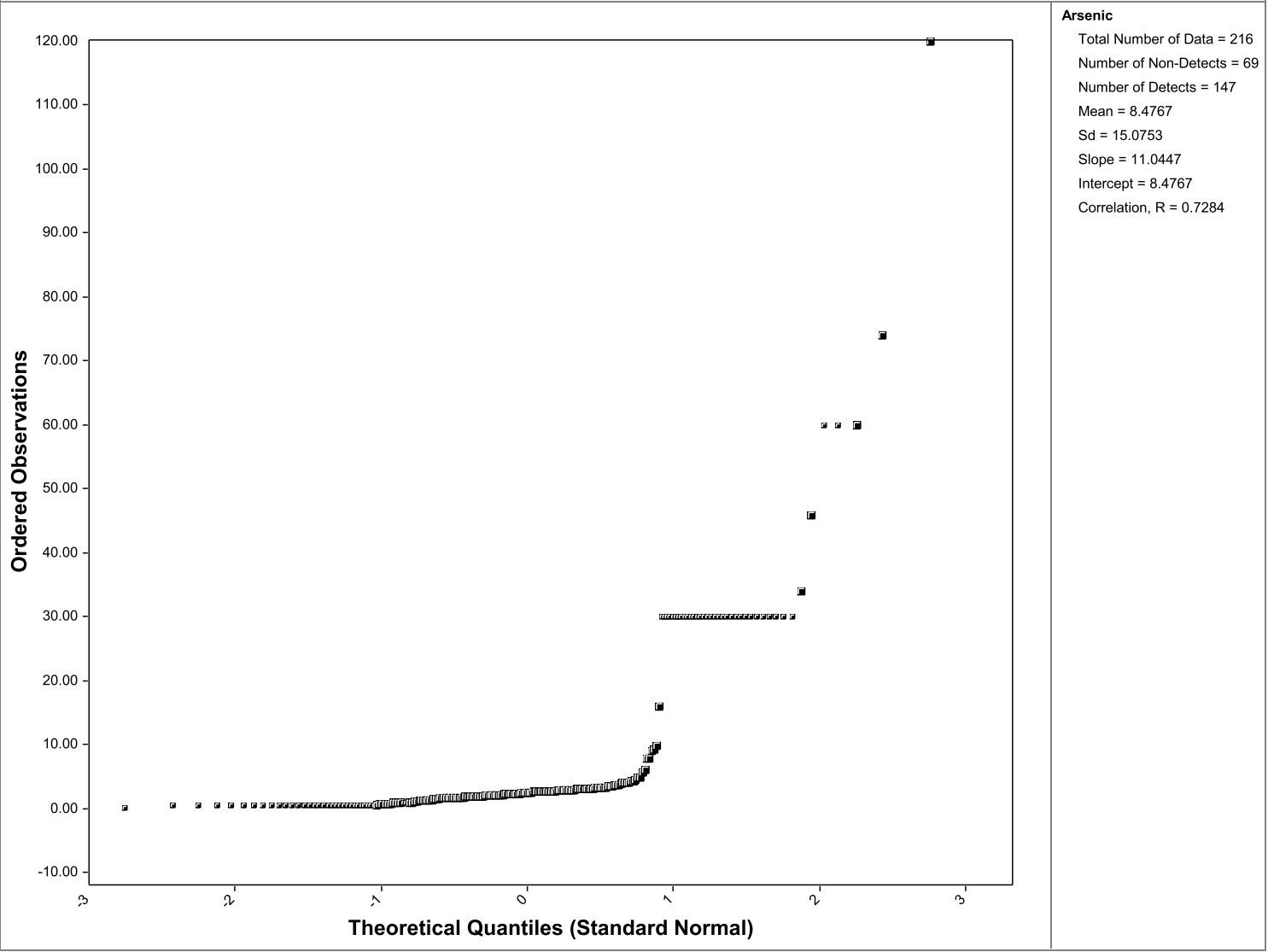


Zinc

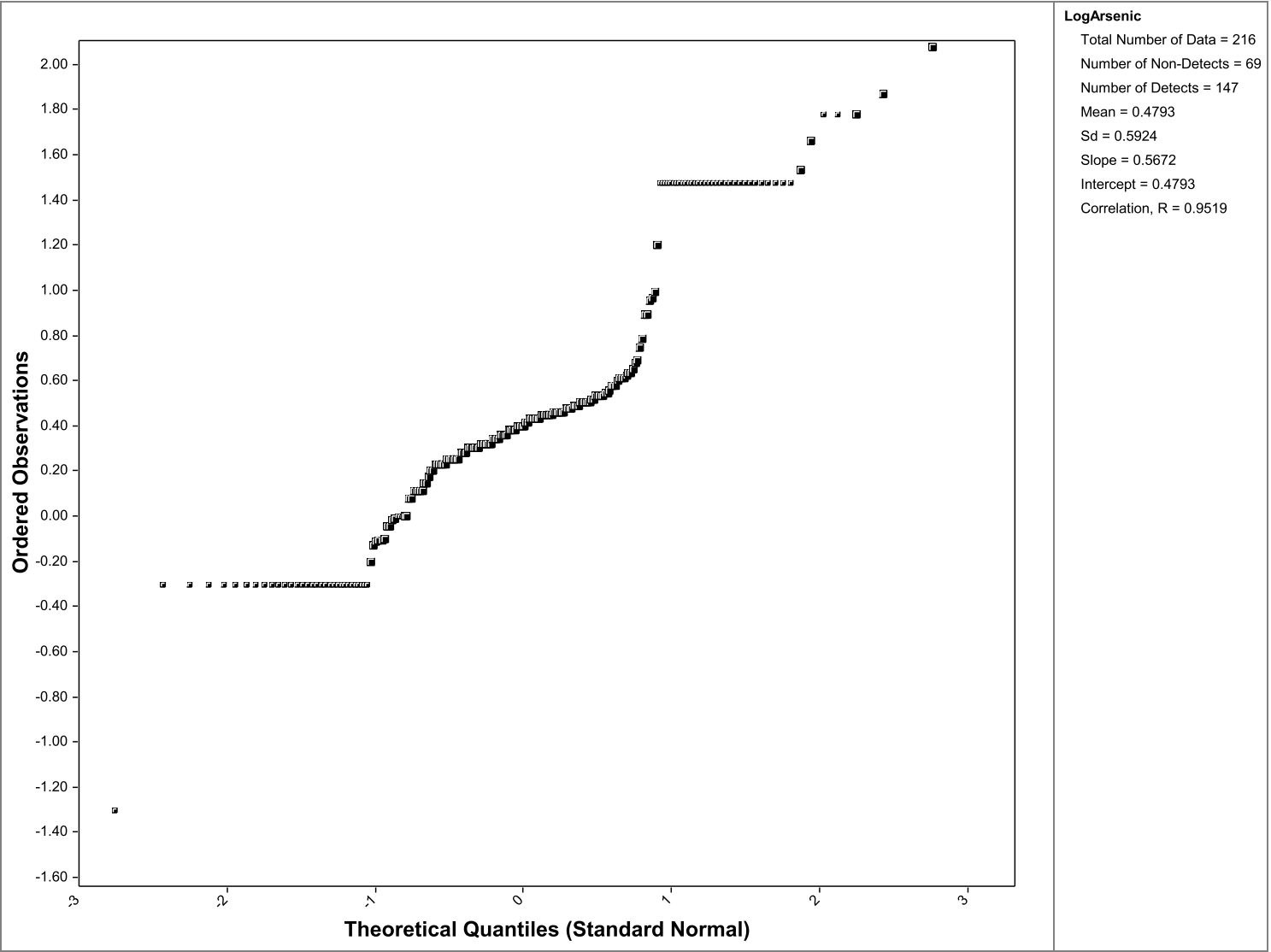
|                                     | Num Obs    | Num Miss     | Num Valid                   | Detects    | NDs      | % NDs  |
|-------------------------------------|------------|--------------|-----------------------------|------------|----------|--------|
| Raw Statistics                      | 237        | 20           | 217                         | 217        | 0        | 0.00%  |
|                                     | Number     | Minimum      | Maximum                     | Mean       | Median   | SD     |
| Statistics (Full: no NDs)           | 217        | 13.3         | 607                         | 58.04      | 51       | 52.09  |
|                                     | K Hat      | K Star       | Theta Hat                   | Log Mean   | Log Stdv | Log CV |
| Statistics (Full: no NDs)           | 3.501      | 3.455        | 16.58                       | 3.912      | 0.488    | 0.125  |
| Normal Distribution Test Results    |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Normal ROS |          |        |
| Correlation Coefficient R           | 0.638      | 0.638        | 0.638                       | 0.638      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| Lilliefors (Full: no NDs)           | 0.28       | 0.0601       | Data Not Normal             |            |          |        |
| Gamma Distribution Test Results     |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Gamma ROS  |          |        |
| Correlation Coefficient R           | 0.742      | 0.742        | 0.742                       | 0.742      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| erson-Darling (Full: no NDs)        | 8.271      | 0.759        |                             |            |          |        |
| rov-Smirnov (Full: no NDs)          | 0.166      | 0.062        | Data Not Gamma Distributed  |            |          |        |
| Lognormal Distribution Test Results |            |              |                             |            |          |        |
|                                     | No NDs     | NDs = DL     | NDs = DL/2                  | Log ROS    |          |        |
| Correlation Coefficient R           | 0.955      | 0.955        | 0.955                       | 0.955      |          |        |
|                                     | Test value | Crit. (0.05) | Conclusion with Alpha(0.05) |            |          |        |
| Lilliefors (Full: no NDs)           | 0.116      | 0.0601       | Data Not Lognormal          |            |          |        |

**Note: Substitution methods such as DL or DL/2 are not recommended.**

Attachment B-2  
Normal Probability Plot for Arsenic

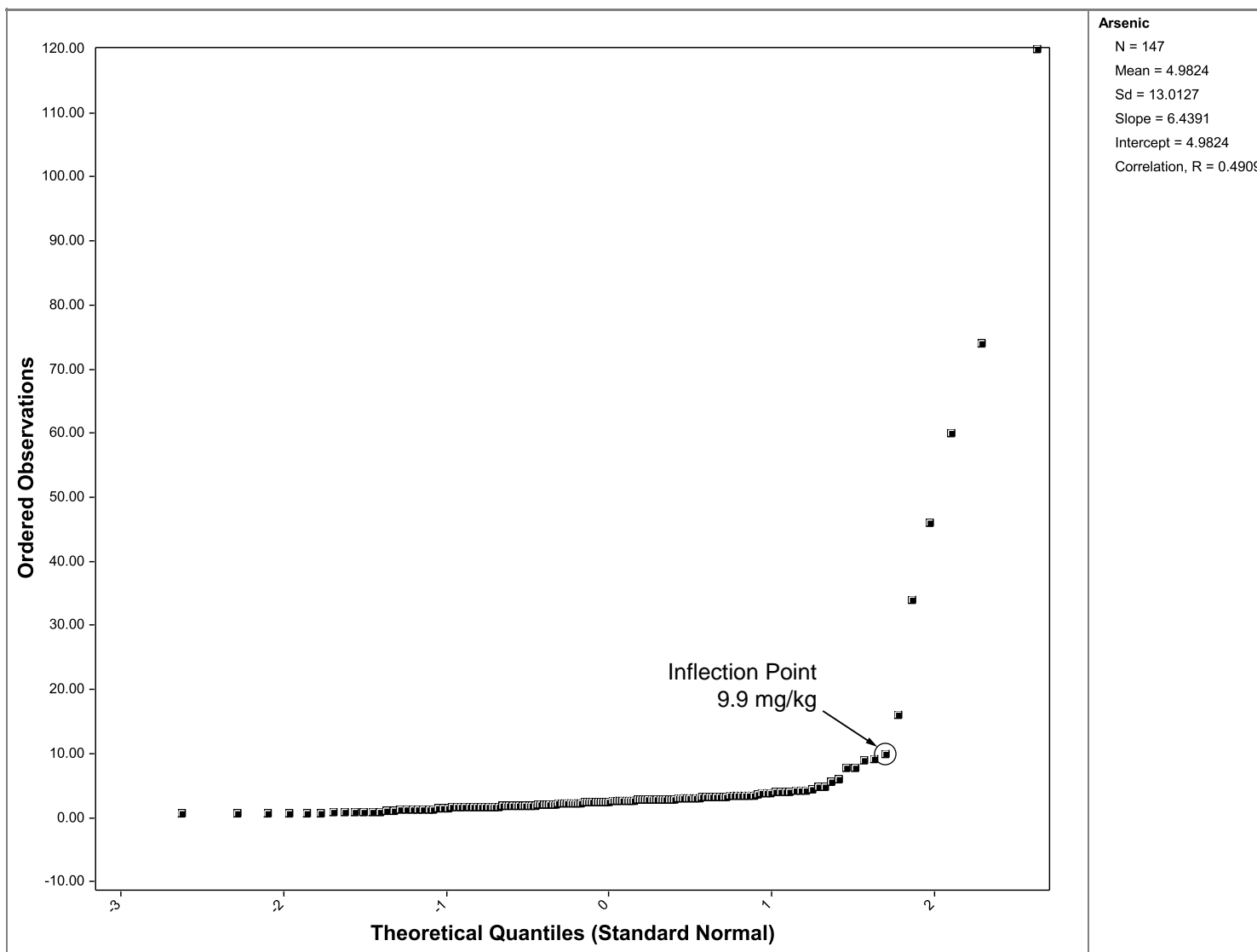


Attachment B-2  
Lognormal Probability Plot for Arsenic



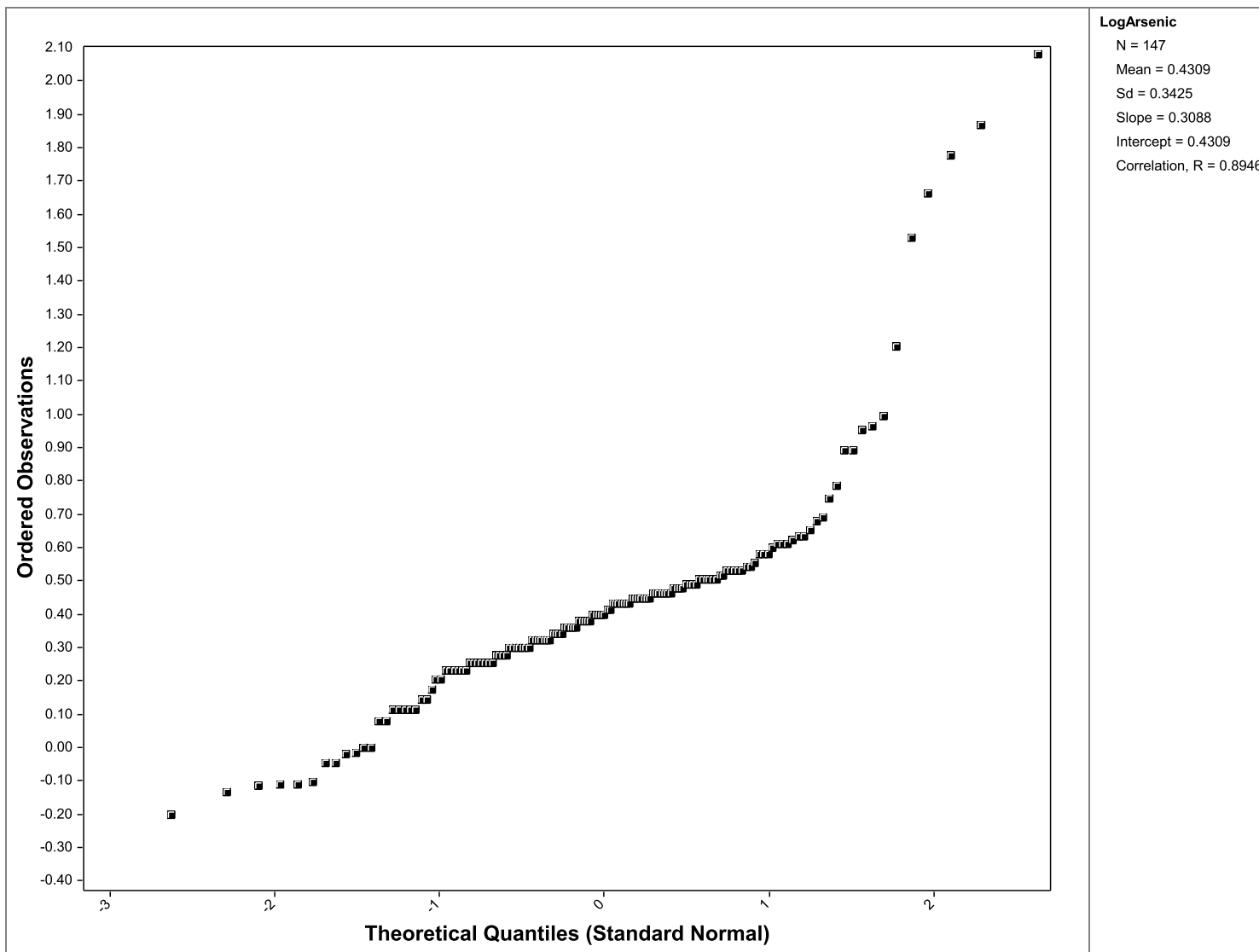
Attachment B-2

Normal Probability Plot for Arsenic, Non-detect Concentrations Removed

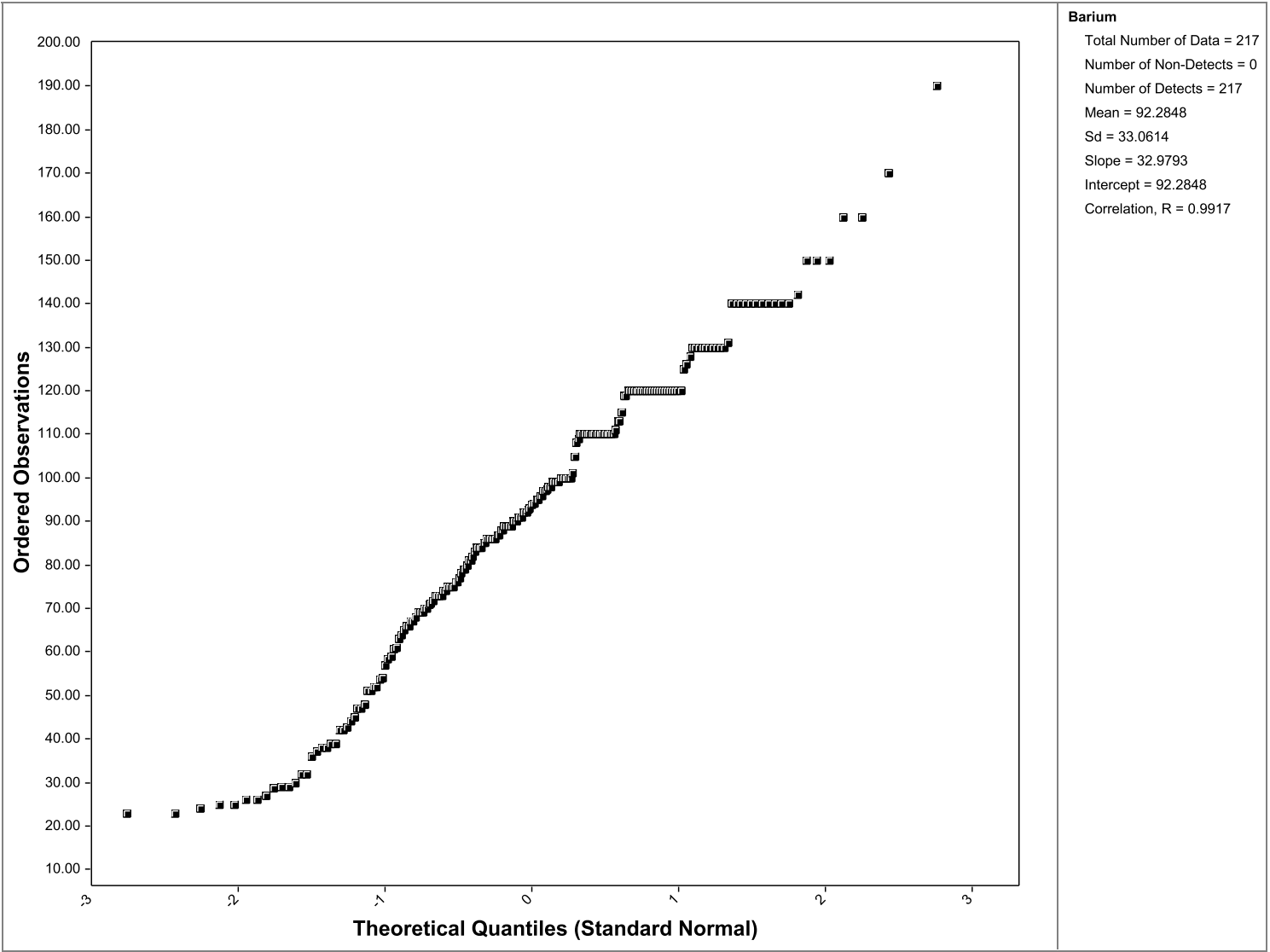


Attachment B-2

Lognormal Probability Plot for Arsenic, Non-detect Concentrations Removed

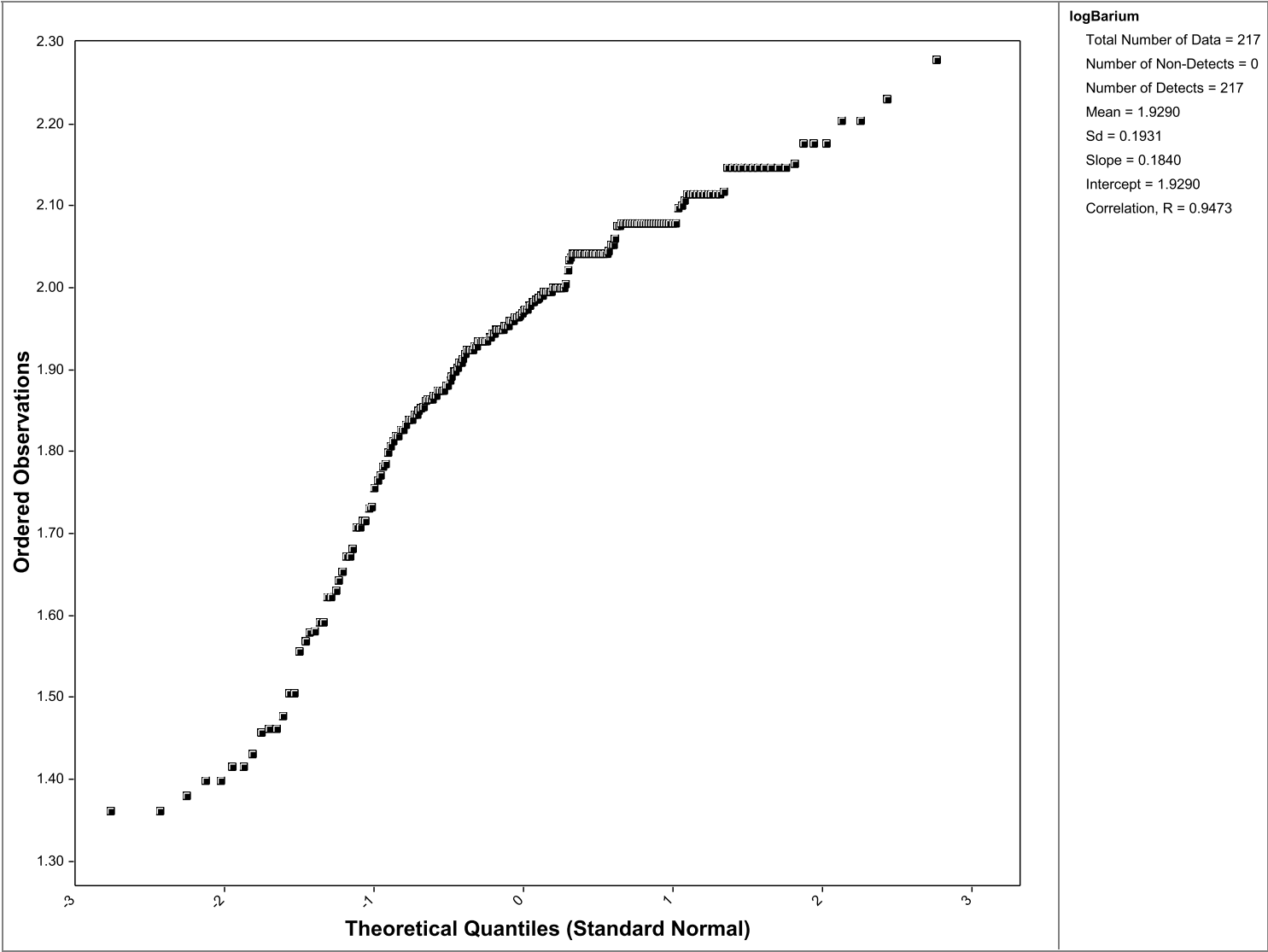


Attachment B-2  
Normal Probability Plot for Barium

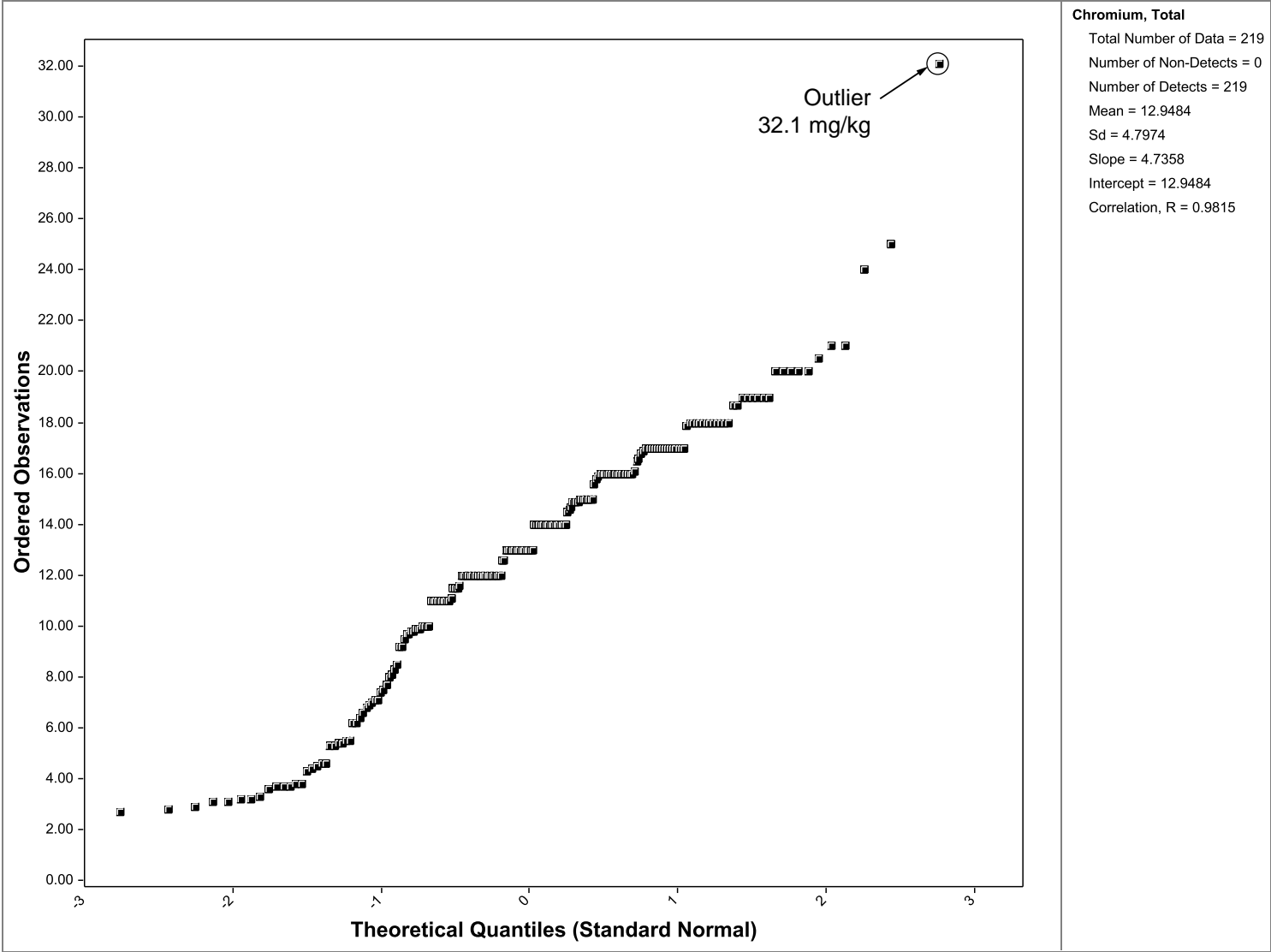




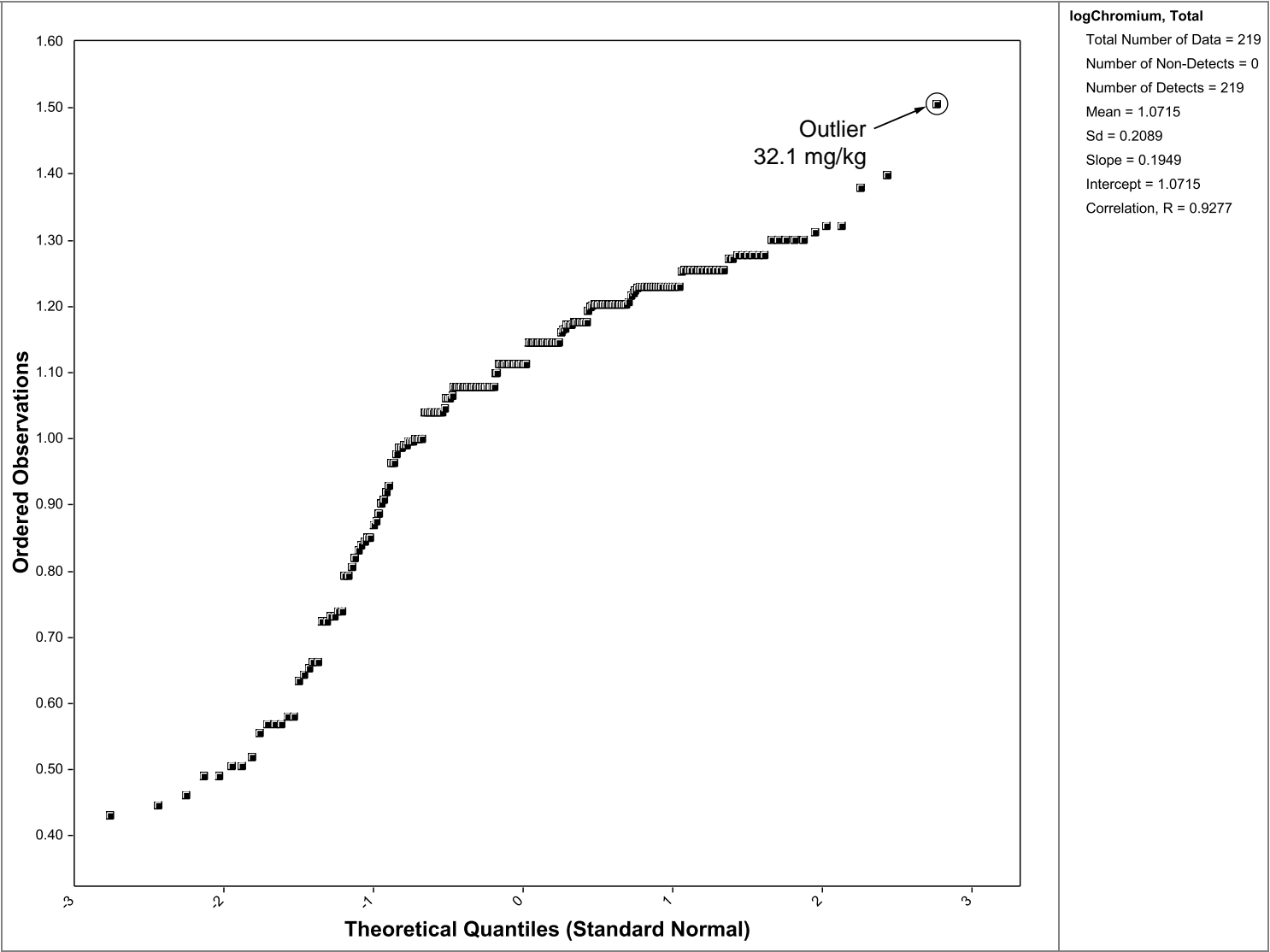
Attachment B-2  
Lognormal Probability Plot for Barium



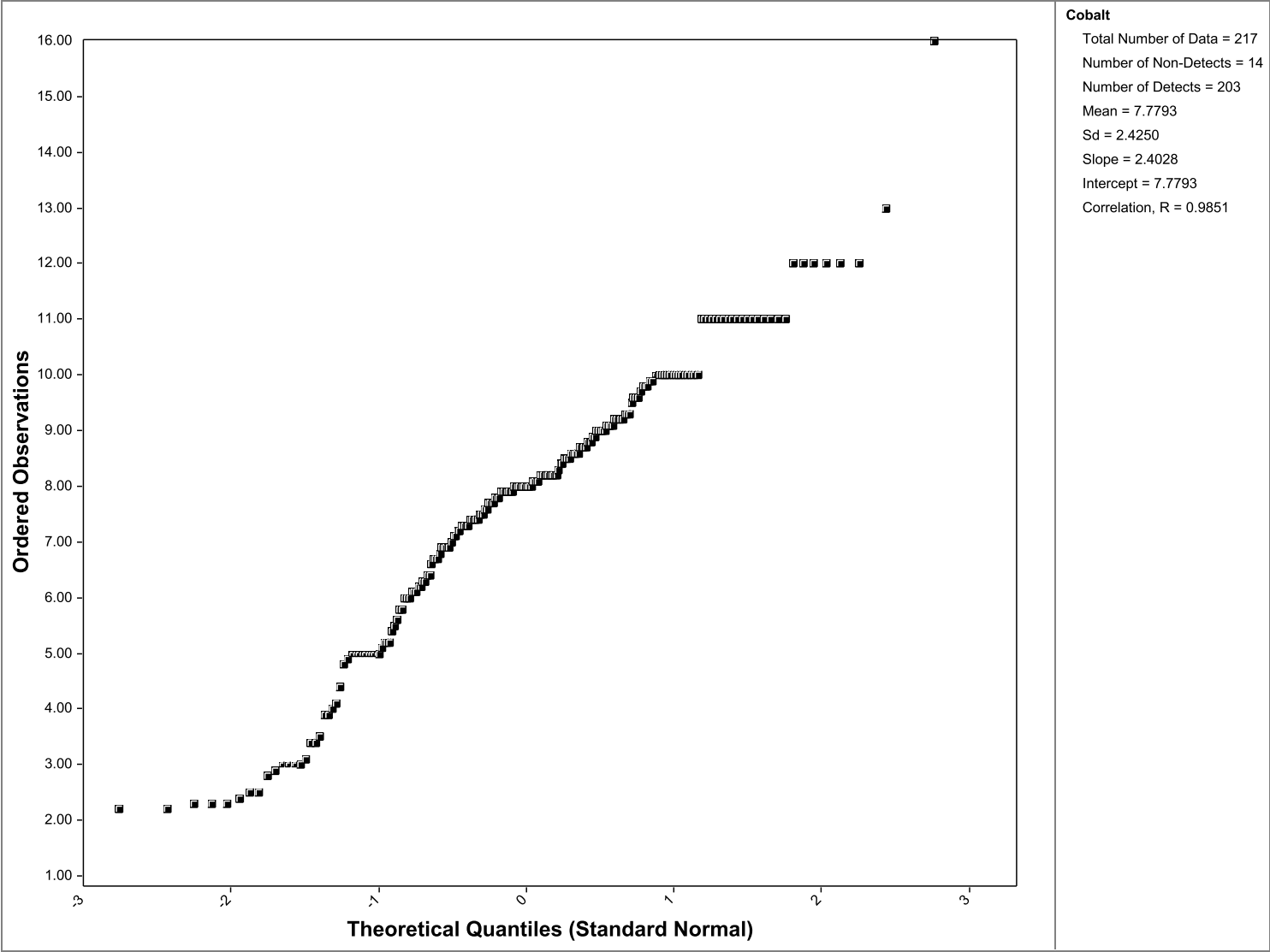
Attachment B-2  
Normal Probability Plot for Total Chromium



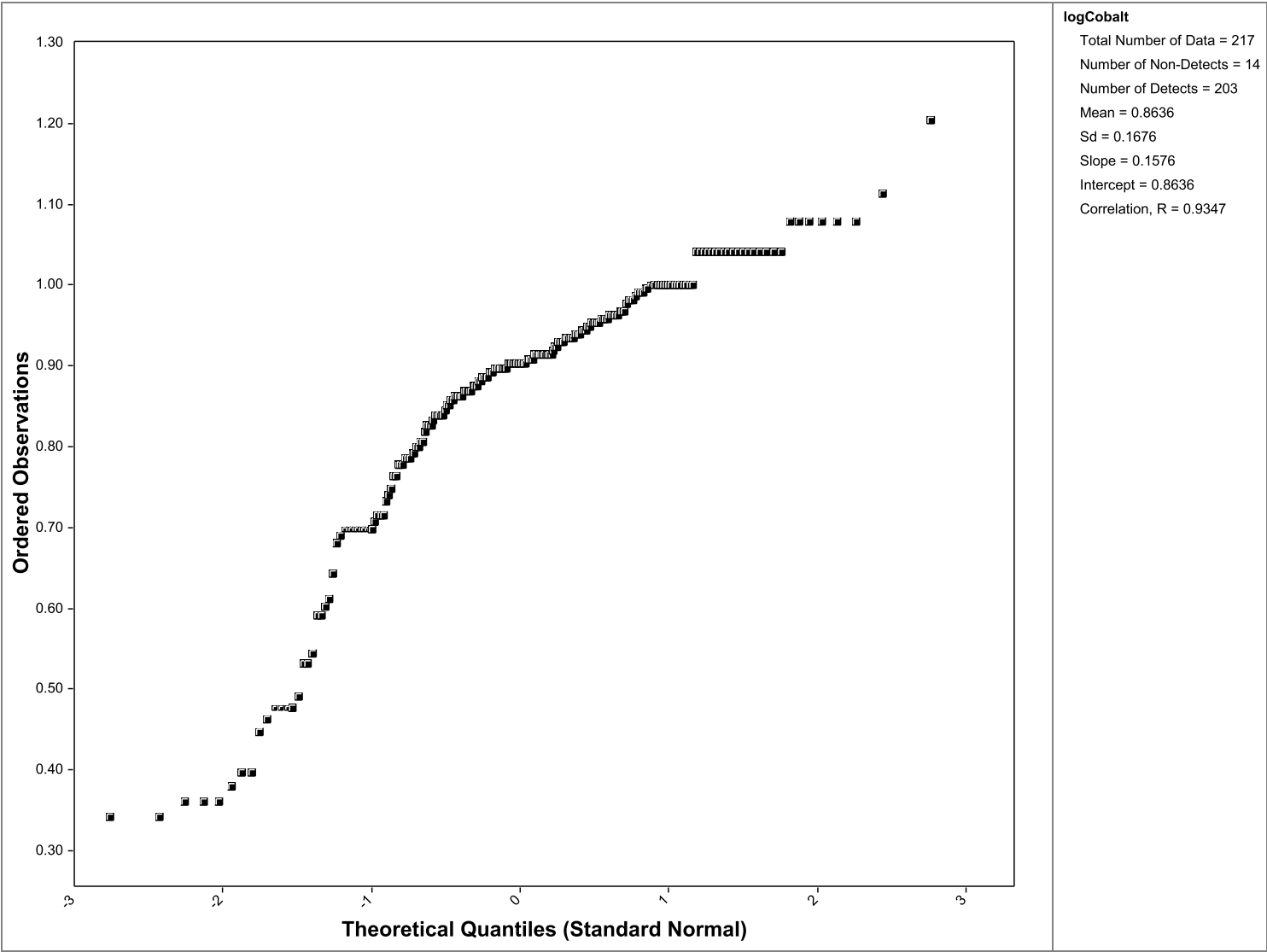
Attachment B-2  
Lognormal Probability Plot for Total Chromium



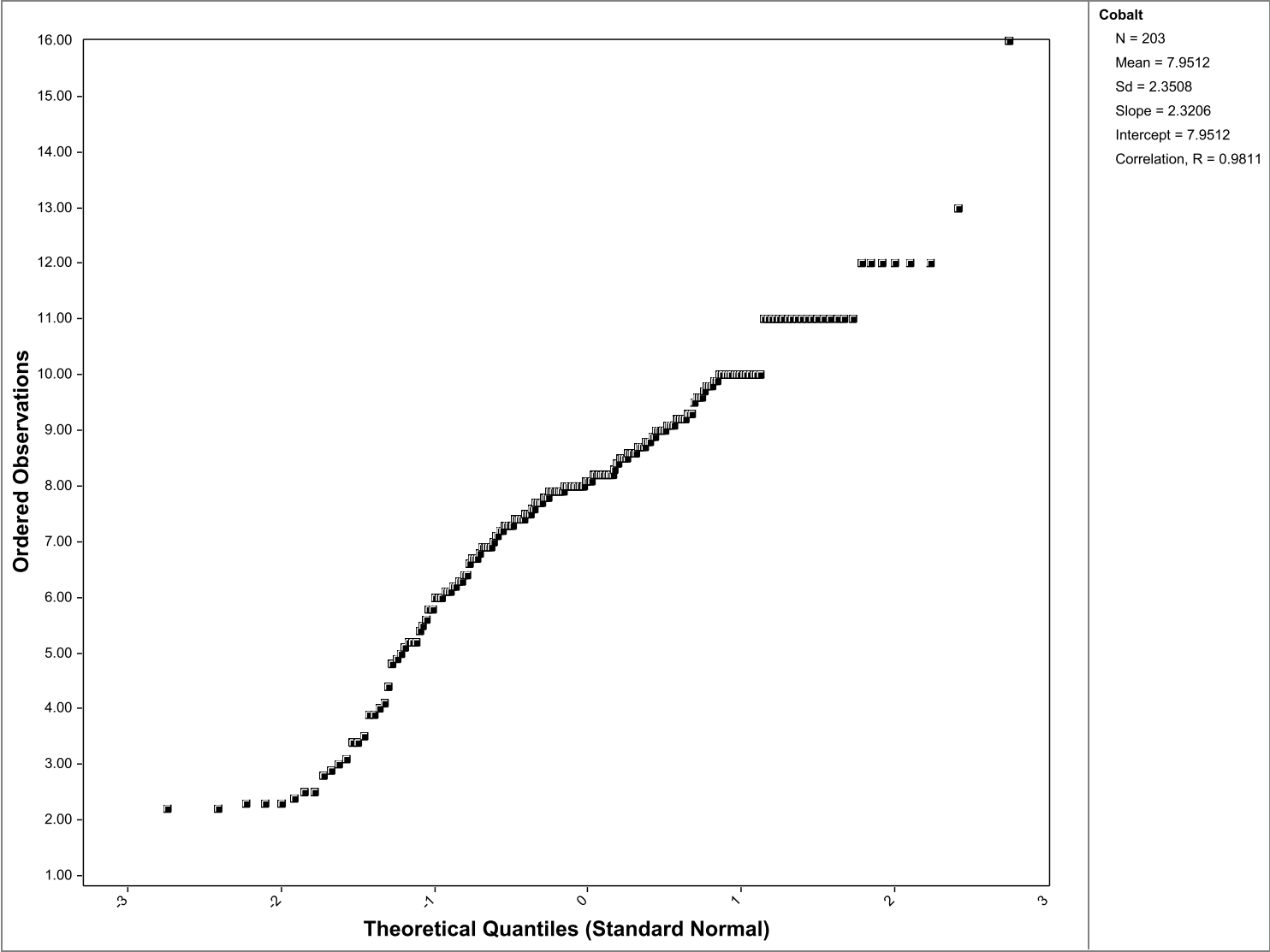
Attachment B-2  
Normal Probability Plot for Cobalt



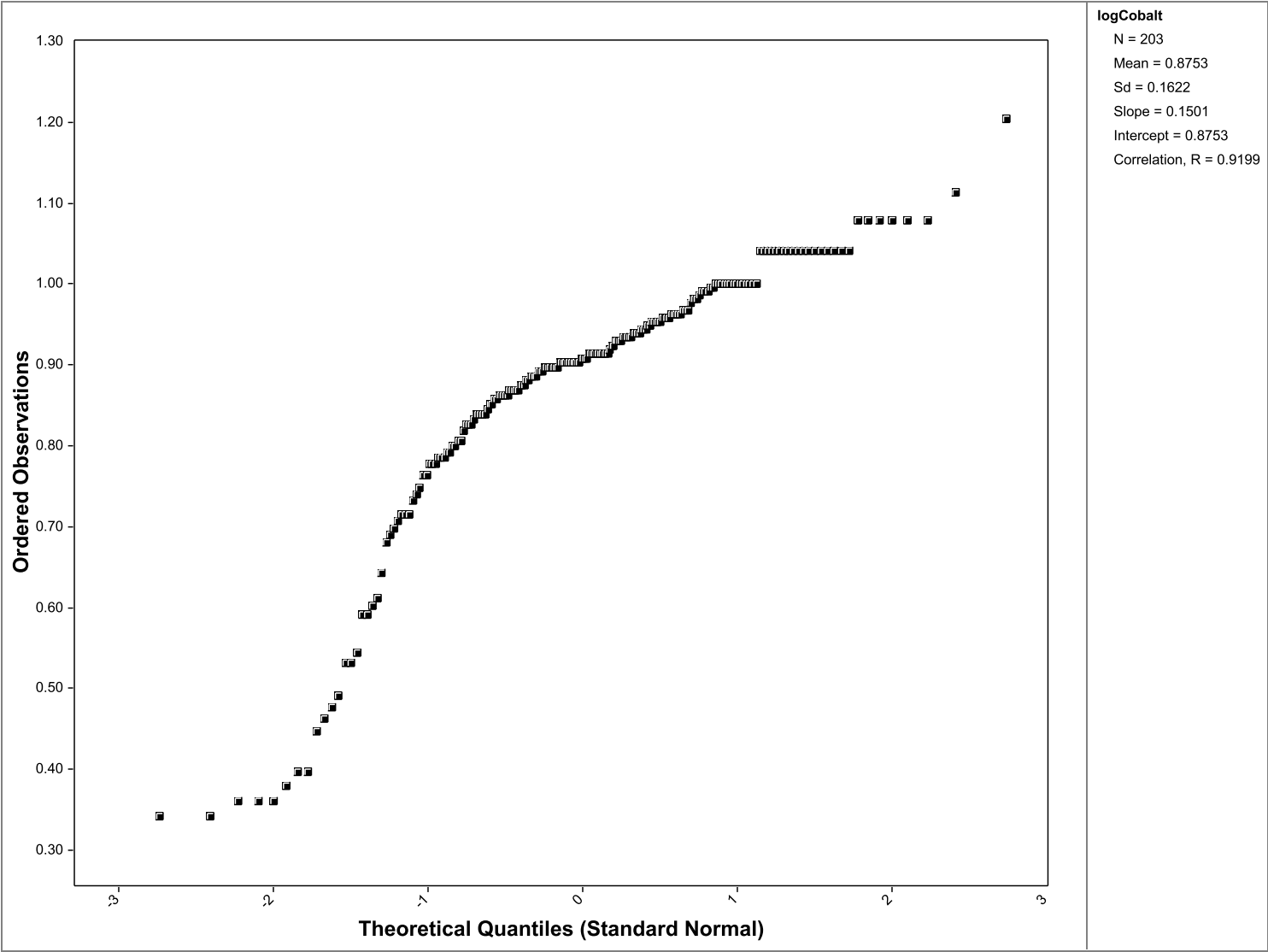
Attachment B-2  
Lognormal Probability Plot for Cobalt



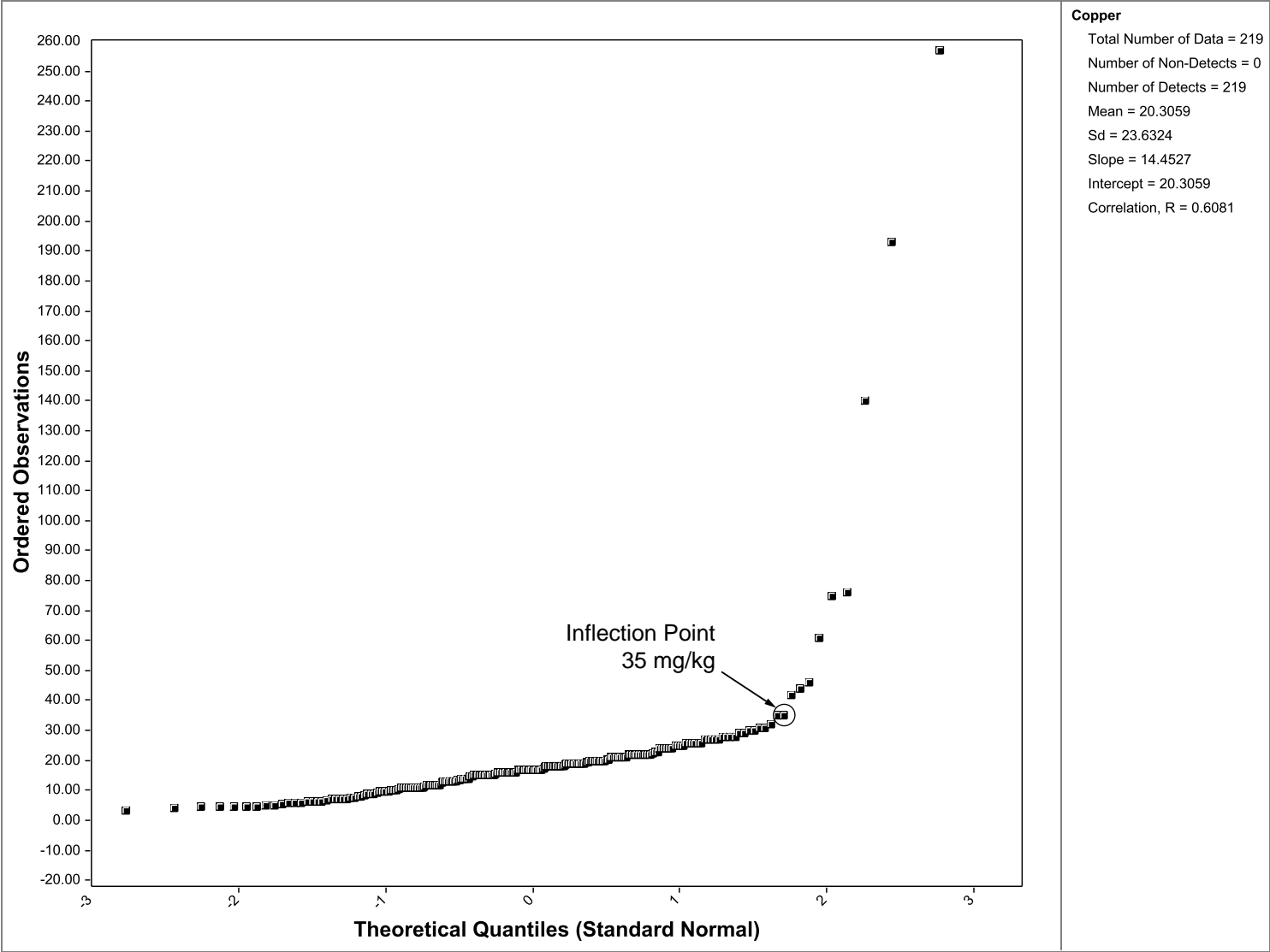
Attachment B-2  
Normal Probability Plot for Cobalt, Non-detect Concentrations Removed



Attachment B-2  
Lognormal Probability Plot for Cobalt, Non-detect Concentrations Removed

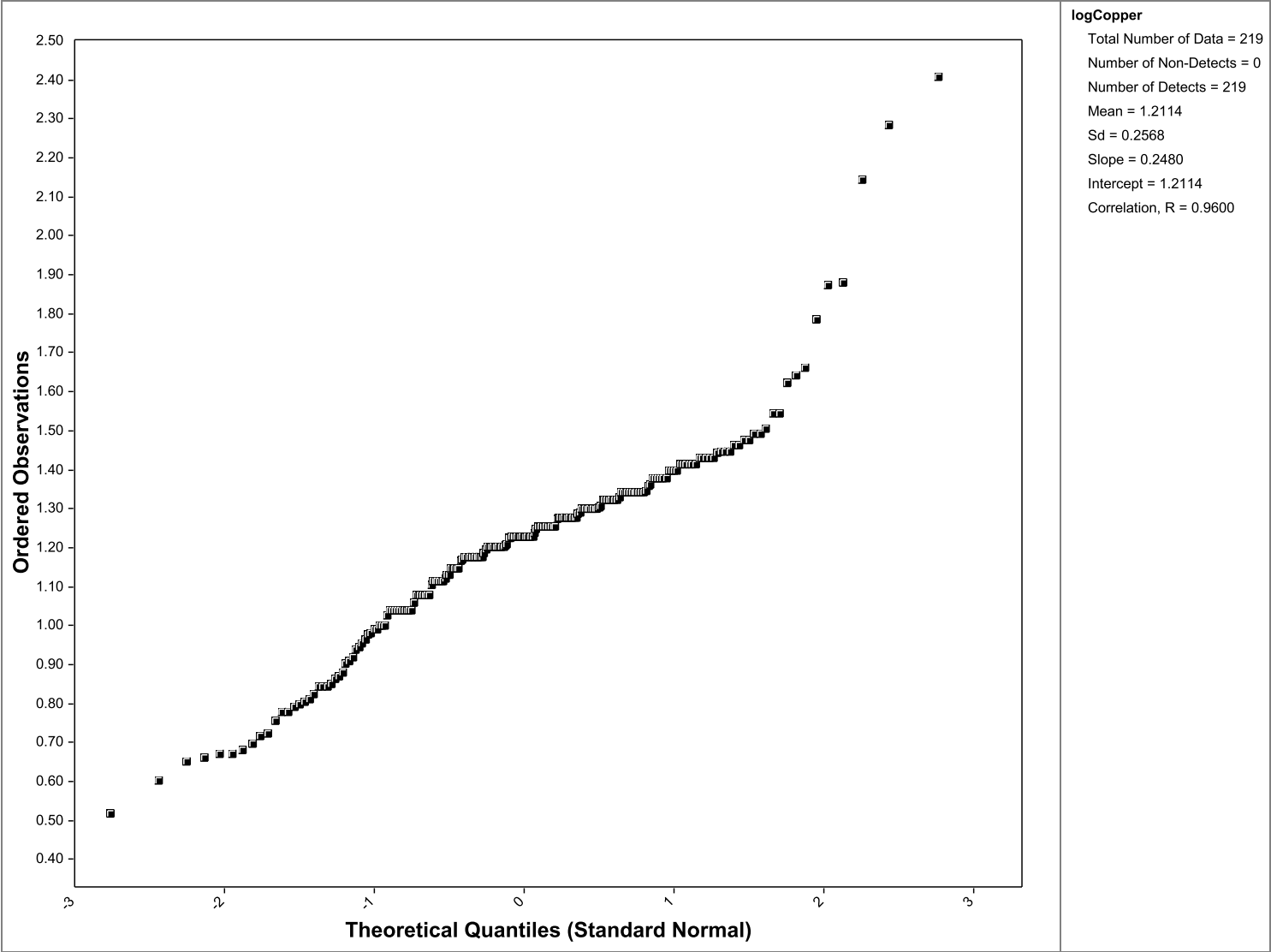


Attachment B-2  
Normal Probability Plot for Copper

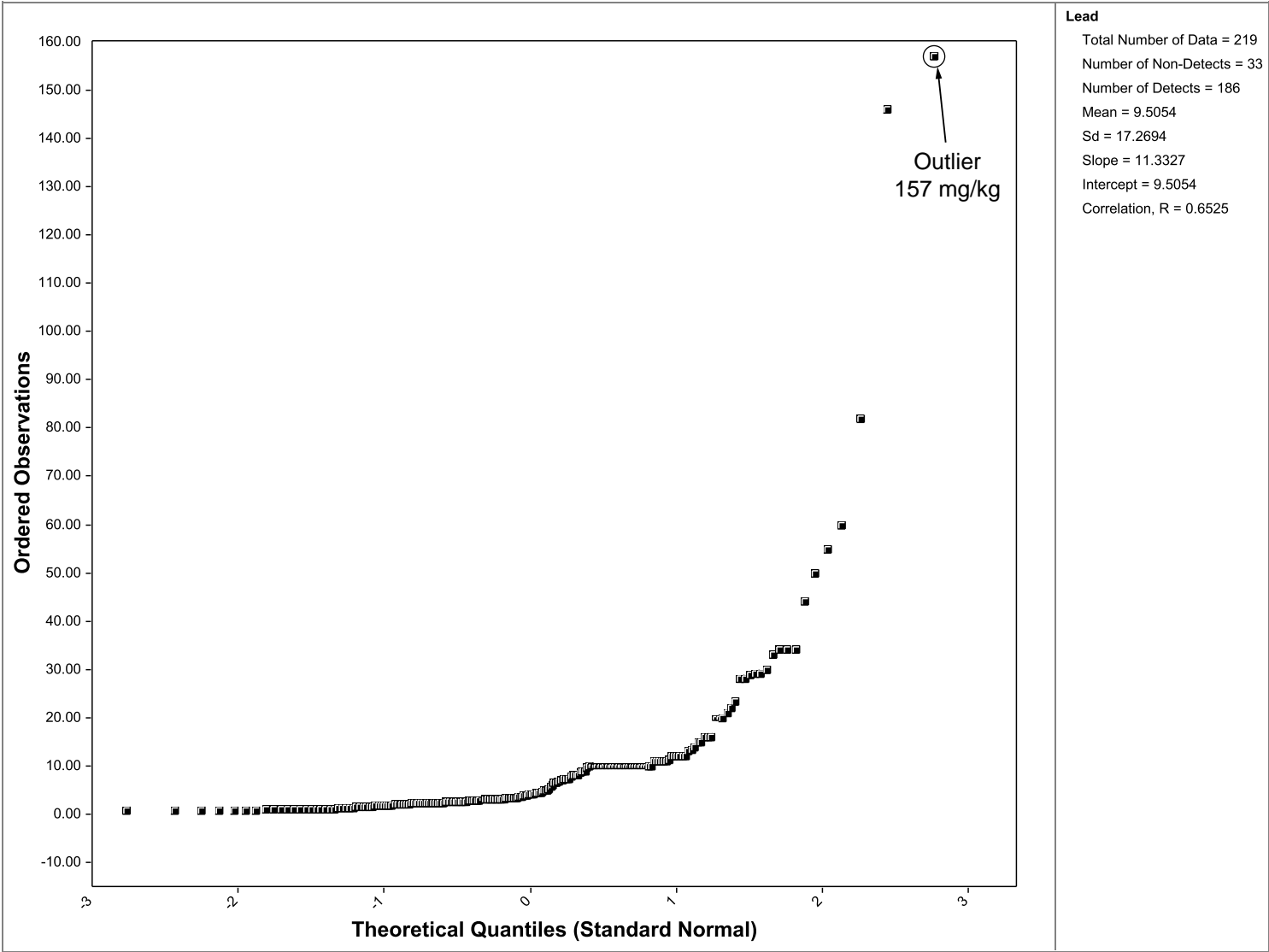




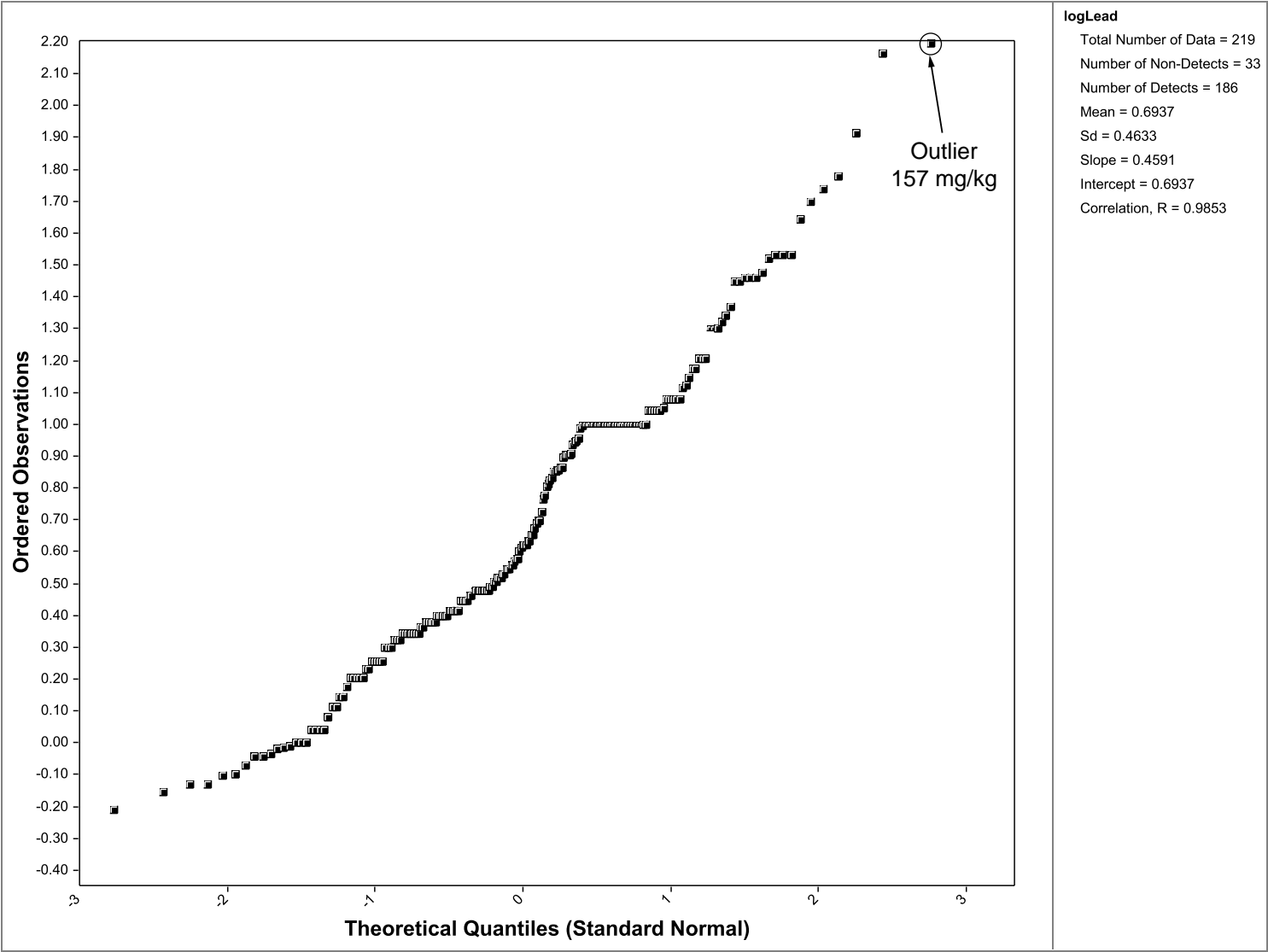
Attachment B-2  
Lognormal Probability Plot for Copper



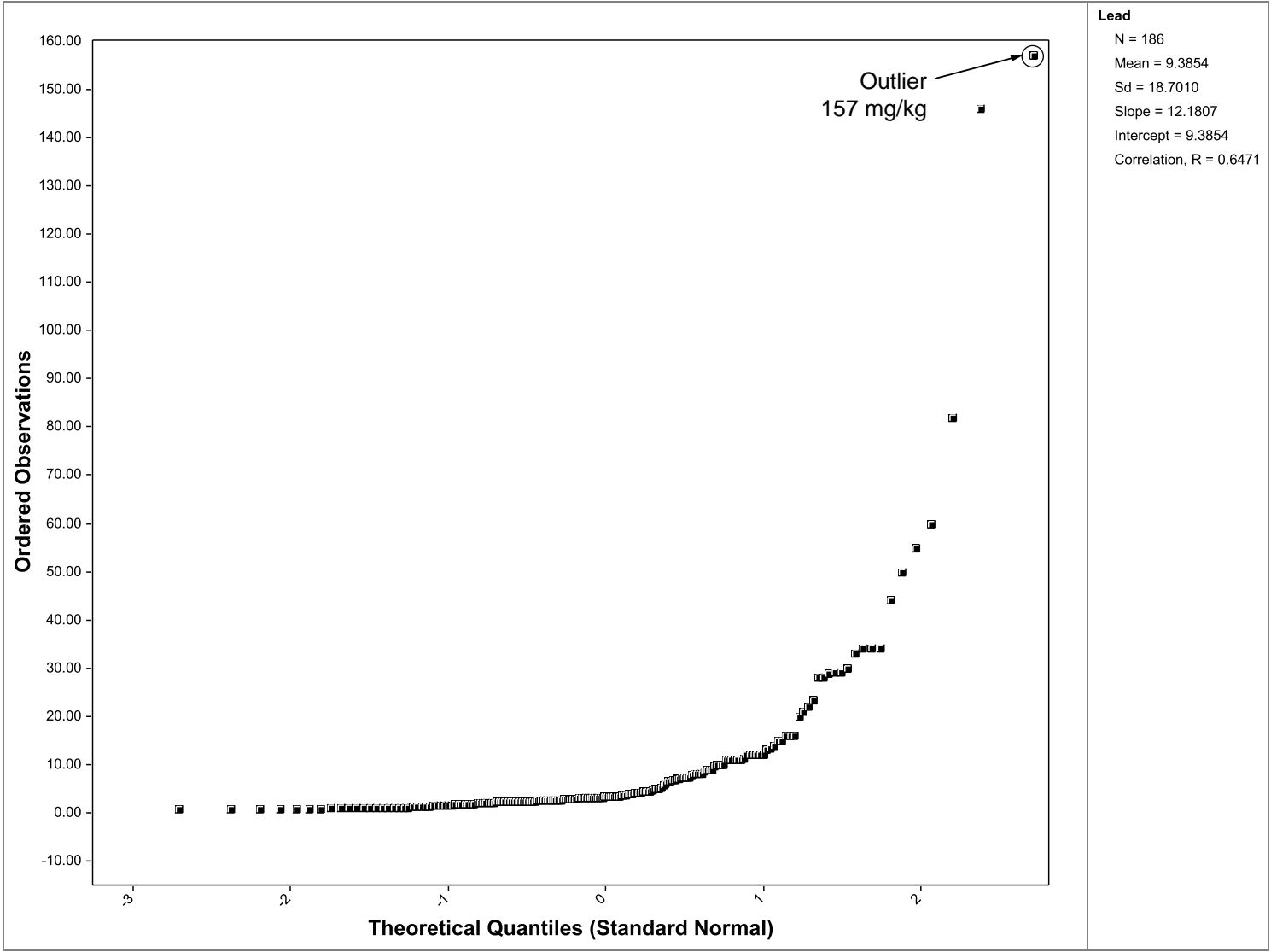
Attachment B-2  
Normal Probability Plot for Lead



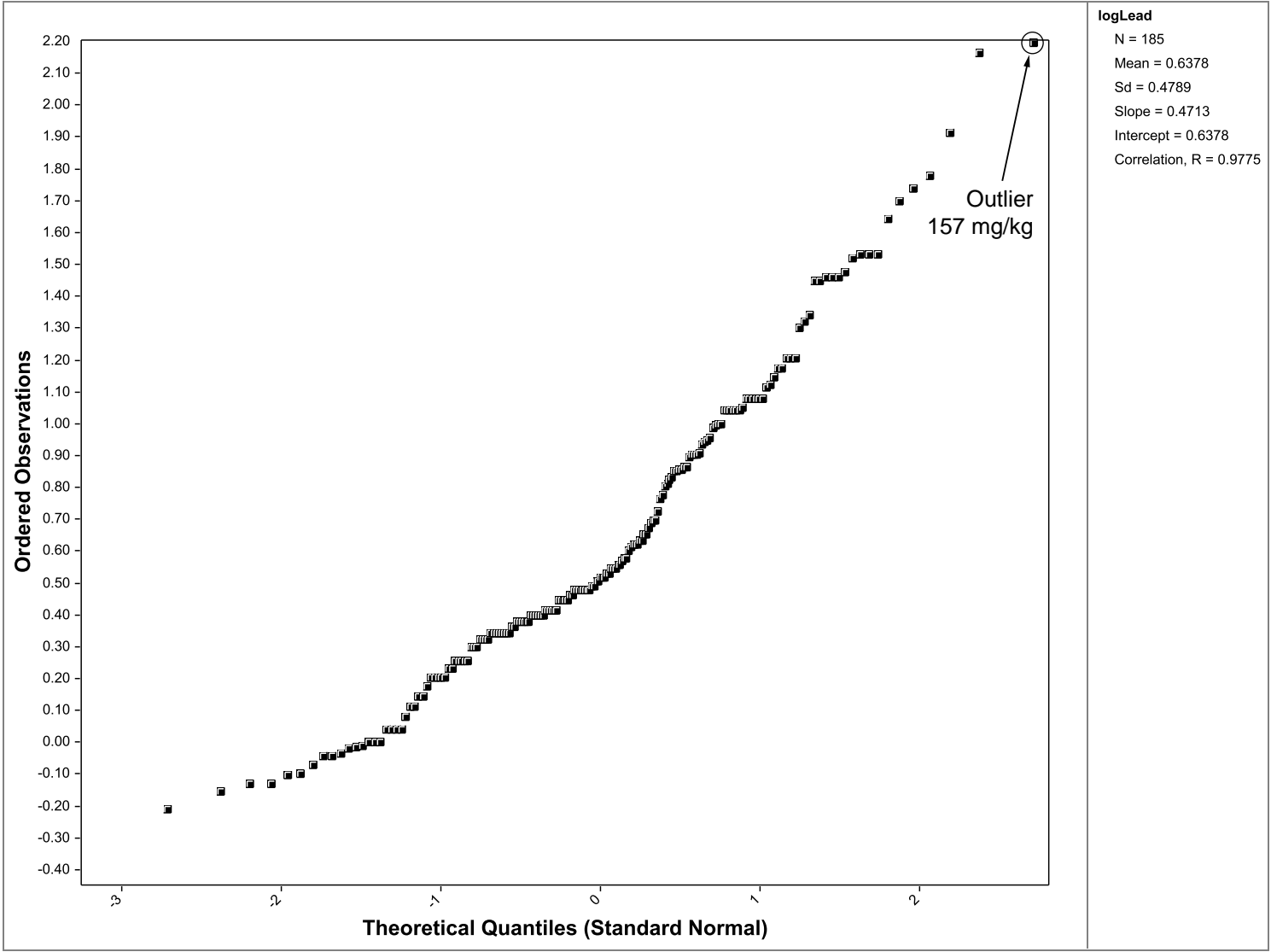
Attachment B-2  
Lognormal Probability Plot for Lead



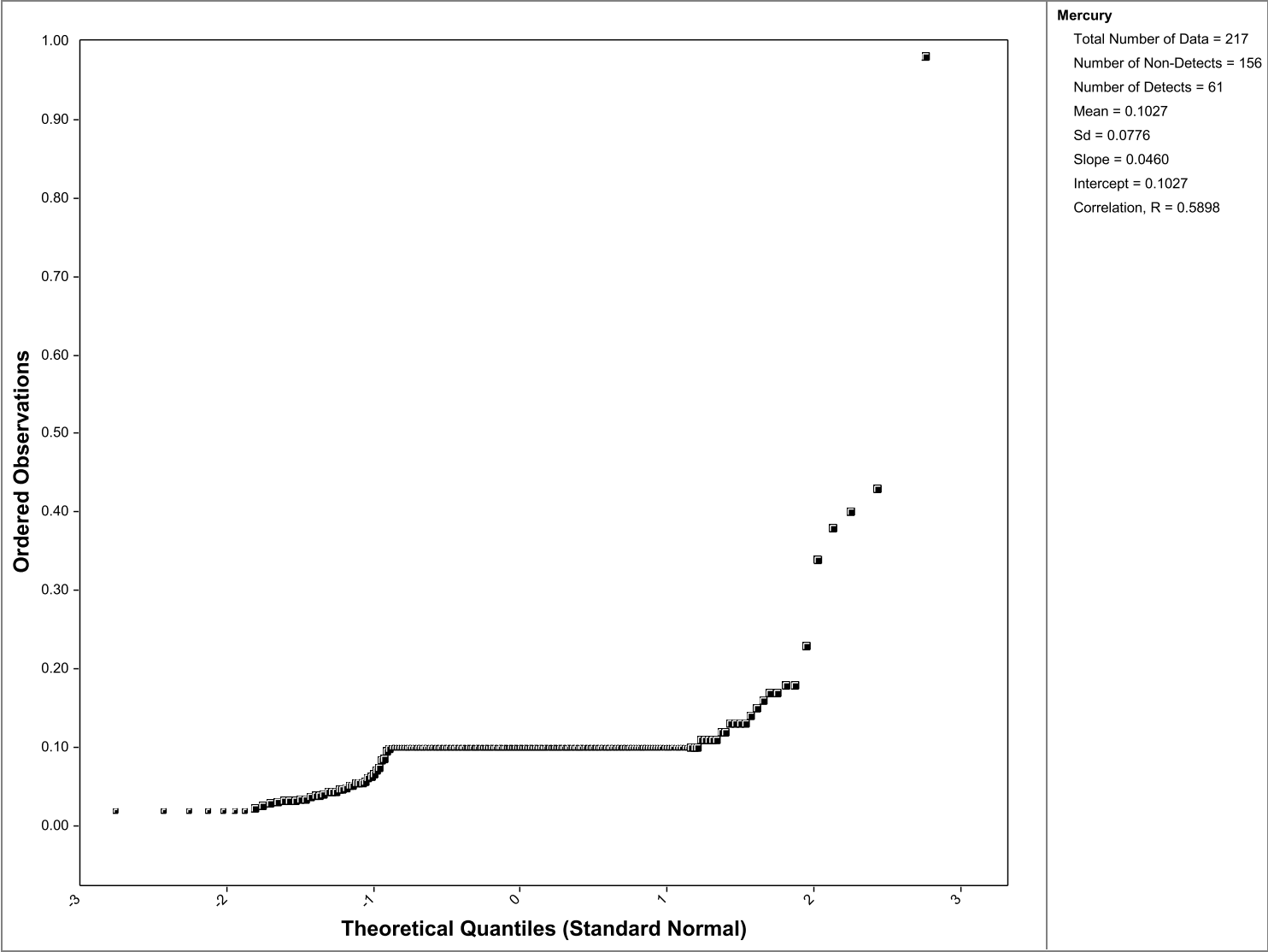
Attachment B-2  
Normal Probability Plot for Lead, Non-detect Concentrations Removed



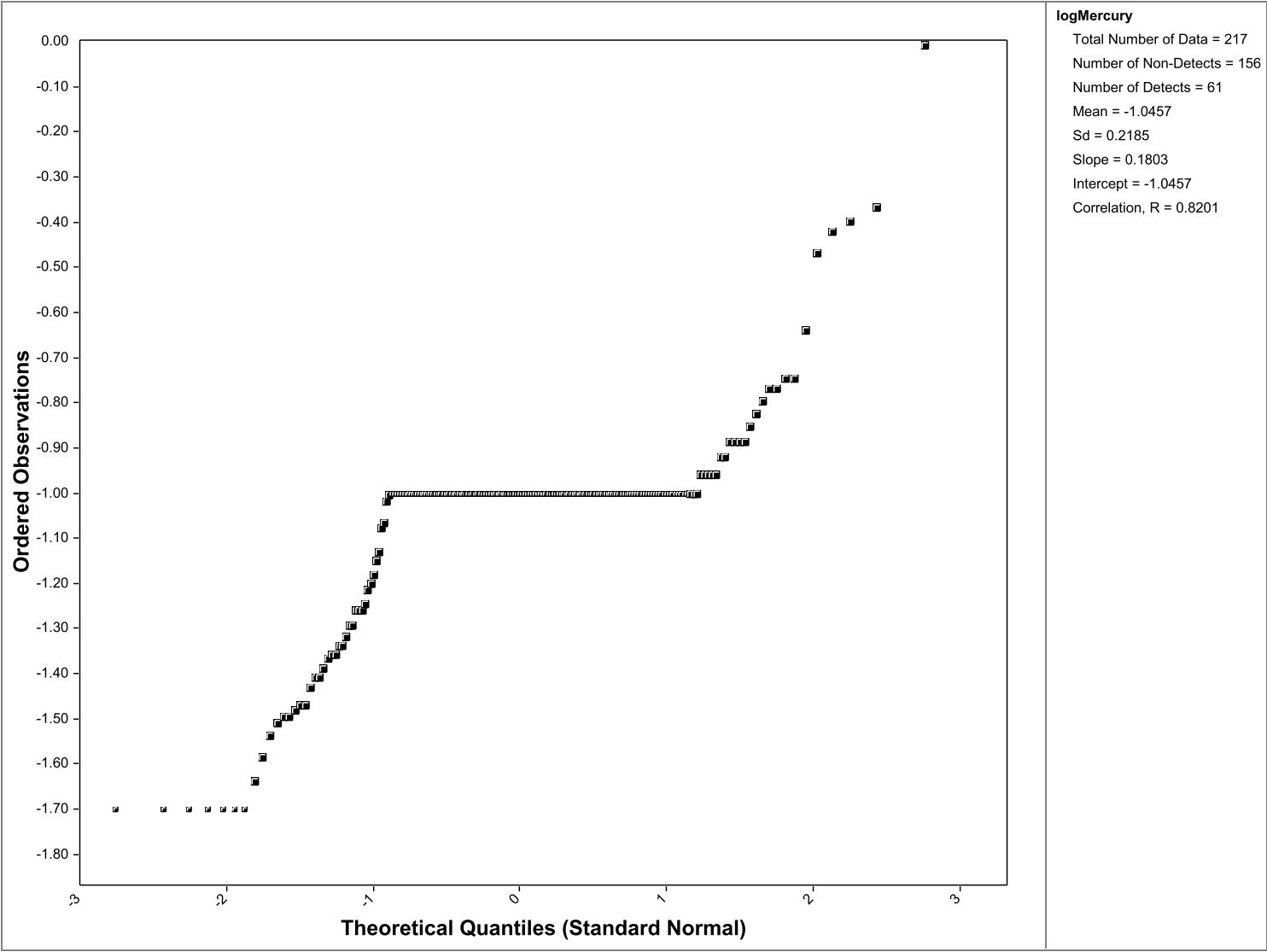
Attachment B-2  
Lognormal Probability Plot for Lead, Non-detect Concentrations Removed



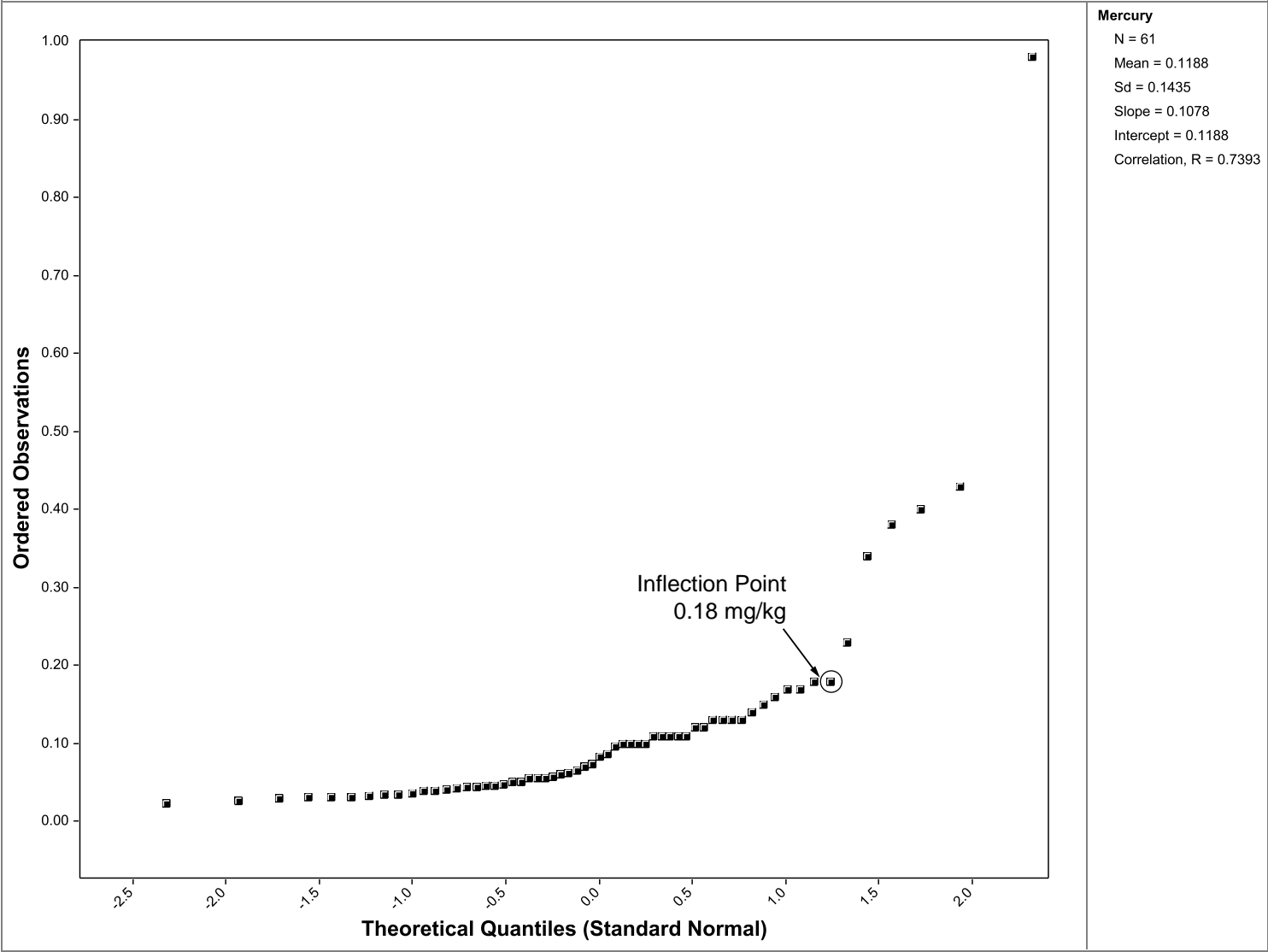
Attachment B-2  
Normal Probability Plot for Mercury



Attachment B-2  
Lognormal Probability Plot for Mercury

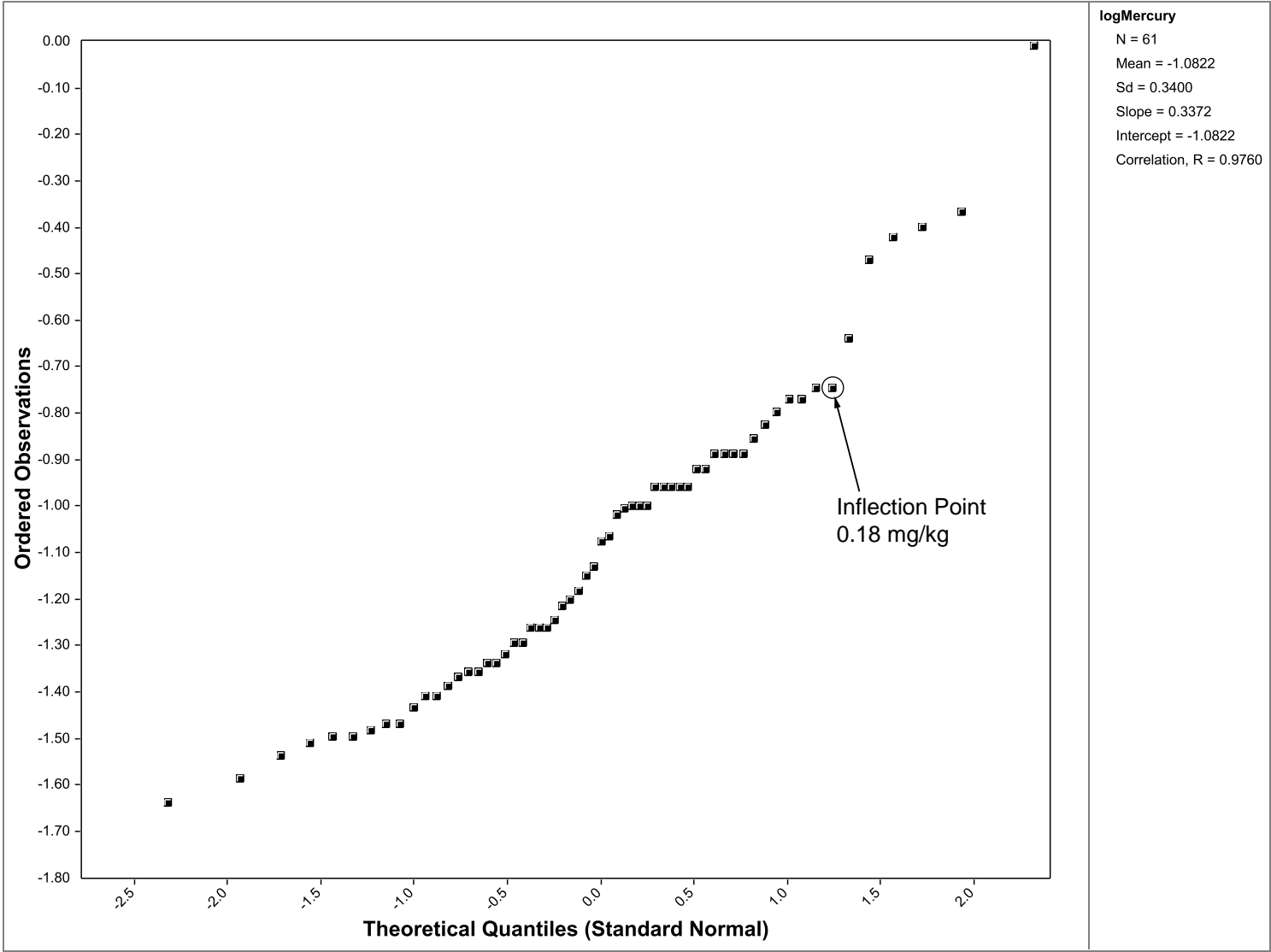


Attachment B-2  
Normal Probability Plot for Mercury, Non-detect Concentrations Removed

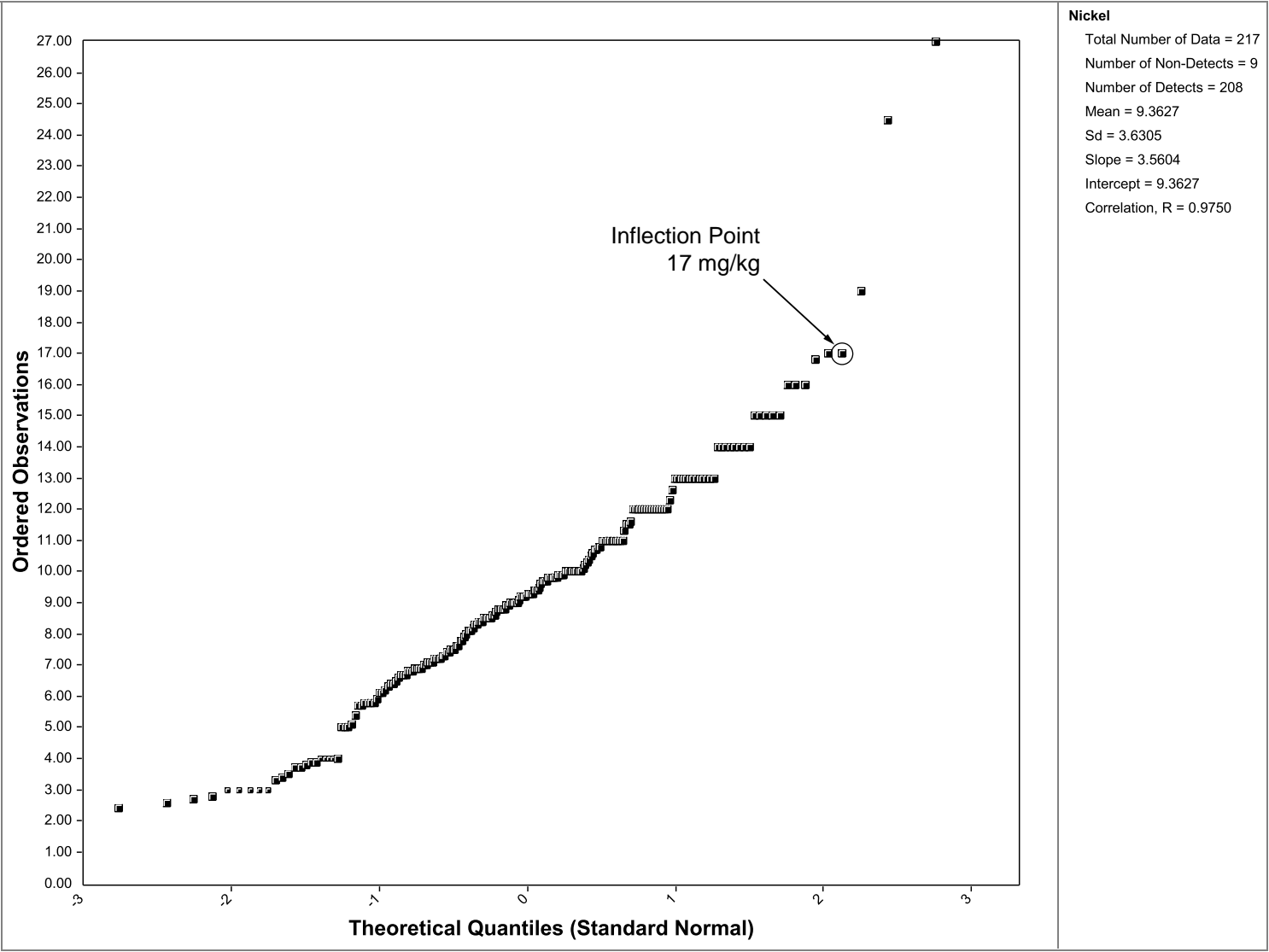




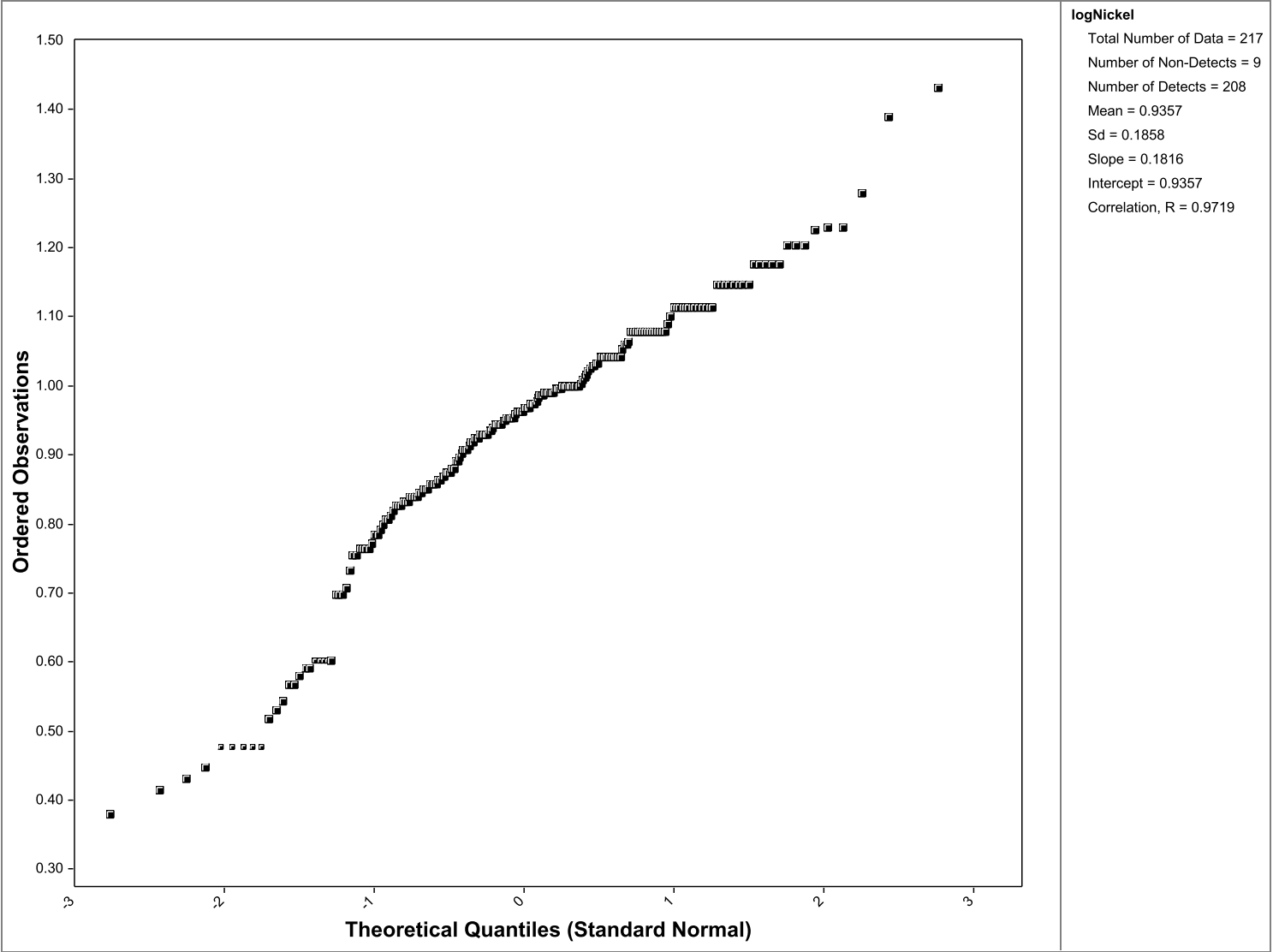
Attachment B-2  
Lognormal Probability Plot for Mercury, Non-detect Concentrations Removed



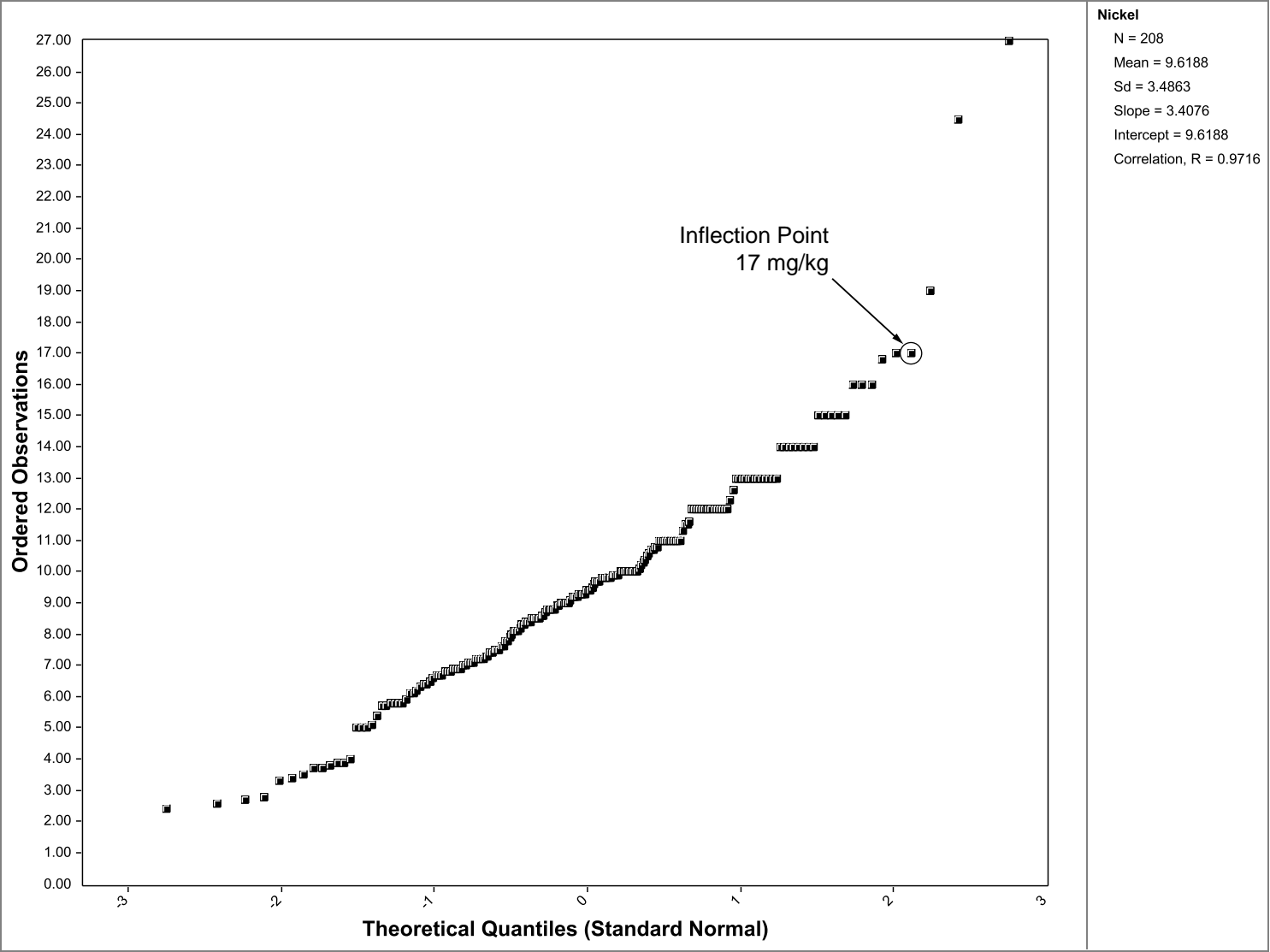
Attachment B-2  
Normal Probability Plot for Nickel



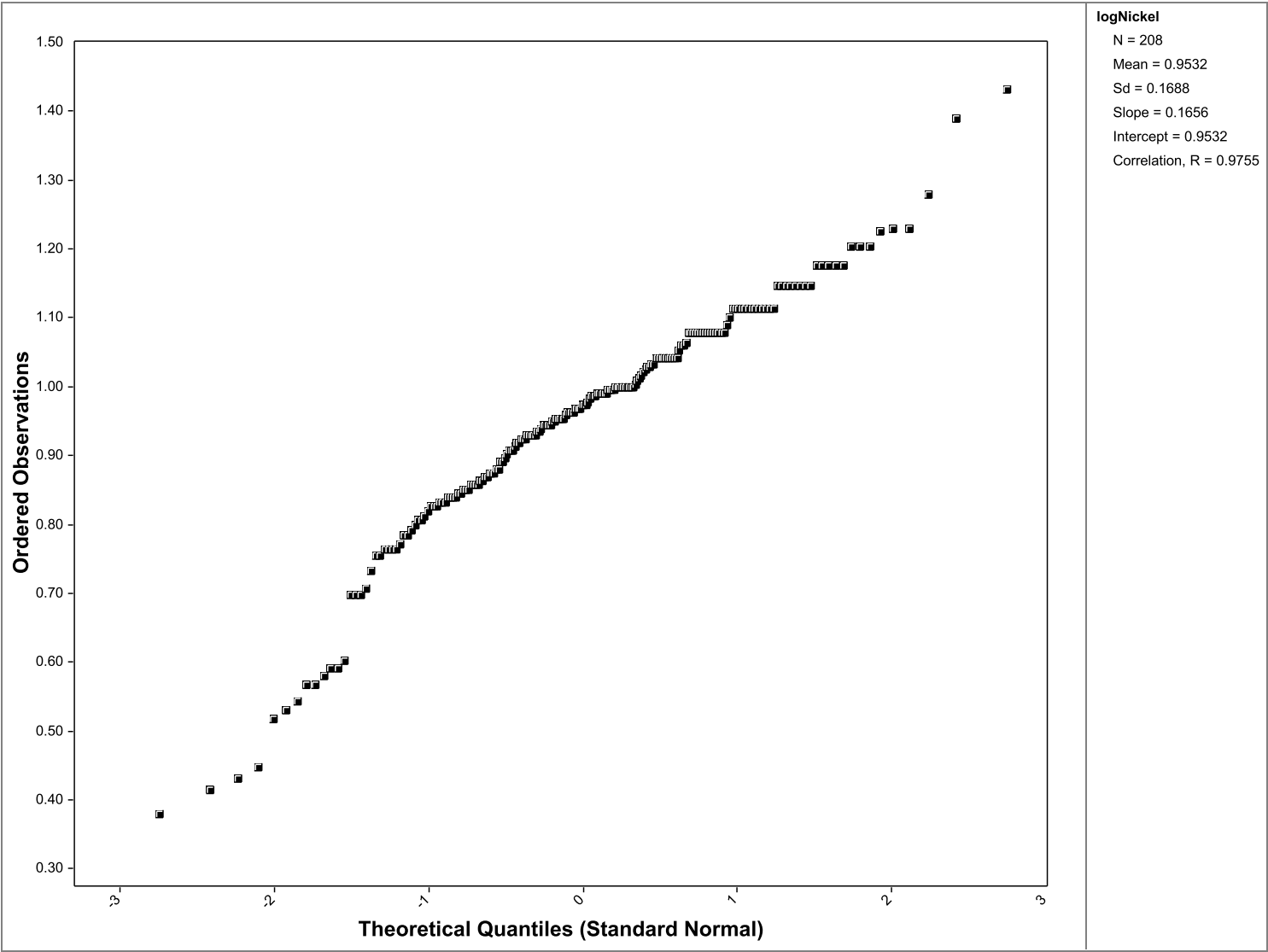
Attachment B-2  
Lognormal Probability Plot for Nickel



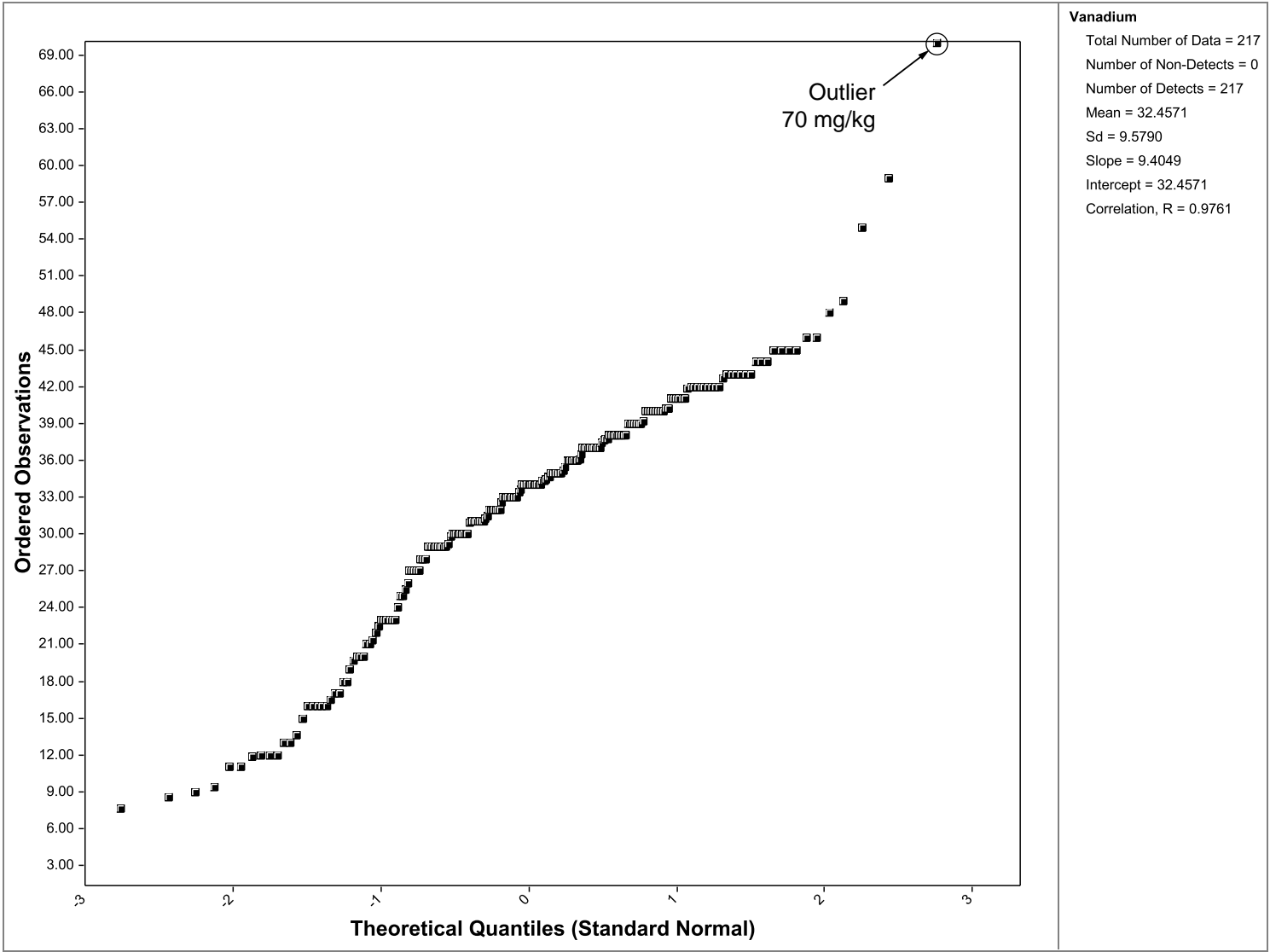
Attachment B-2  
Normal Probability Plot for Nickel, Non-detect Concentrations Removed



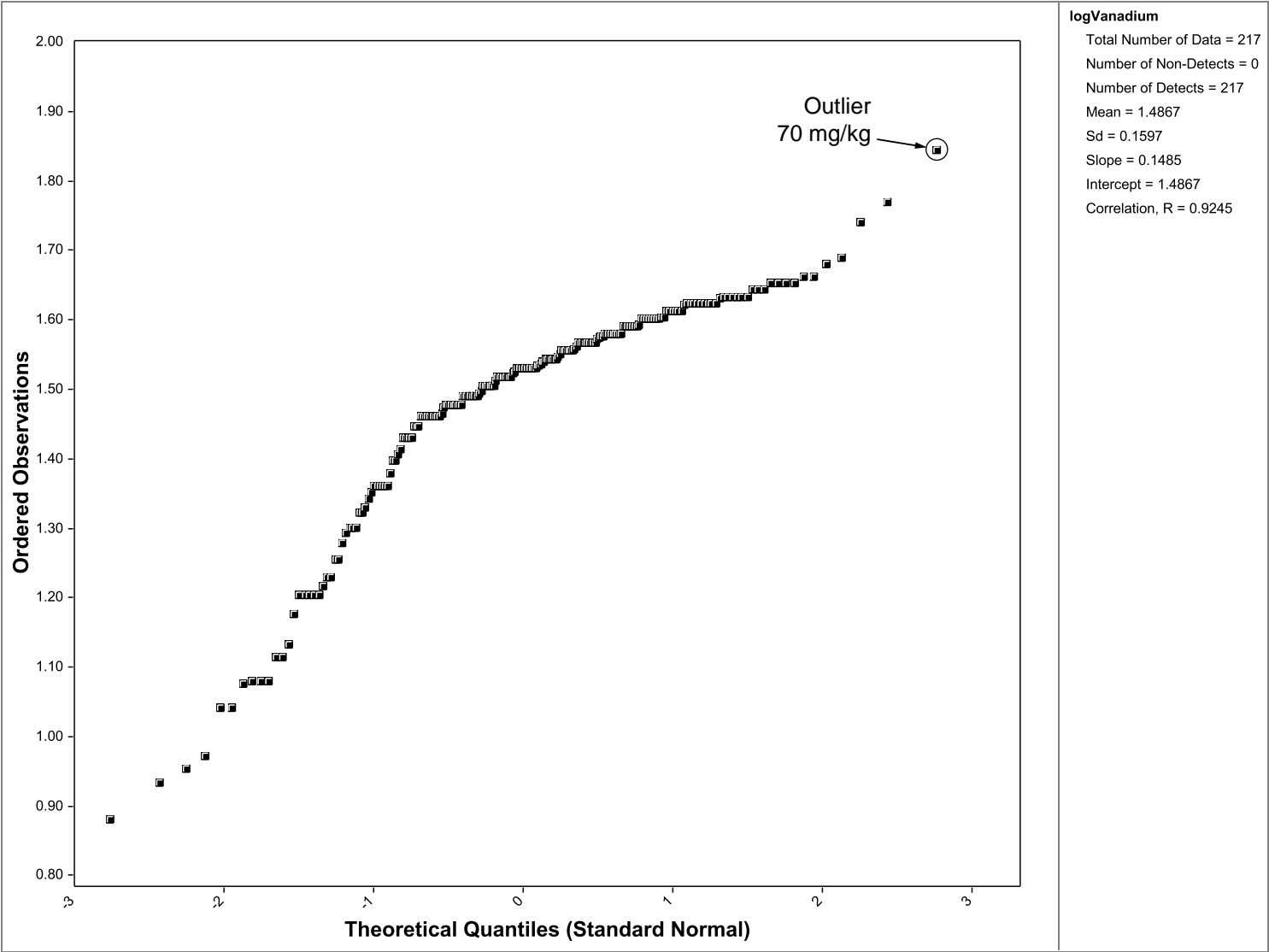
Attachment B-2  
Lognormal Probability Plot for Nickel, Non-detect Concentrations Removed



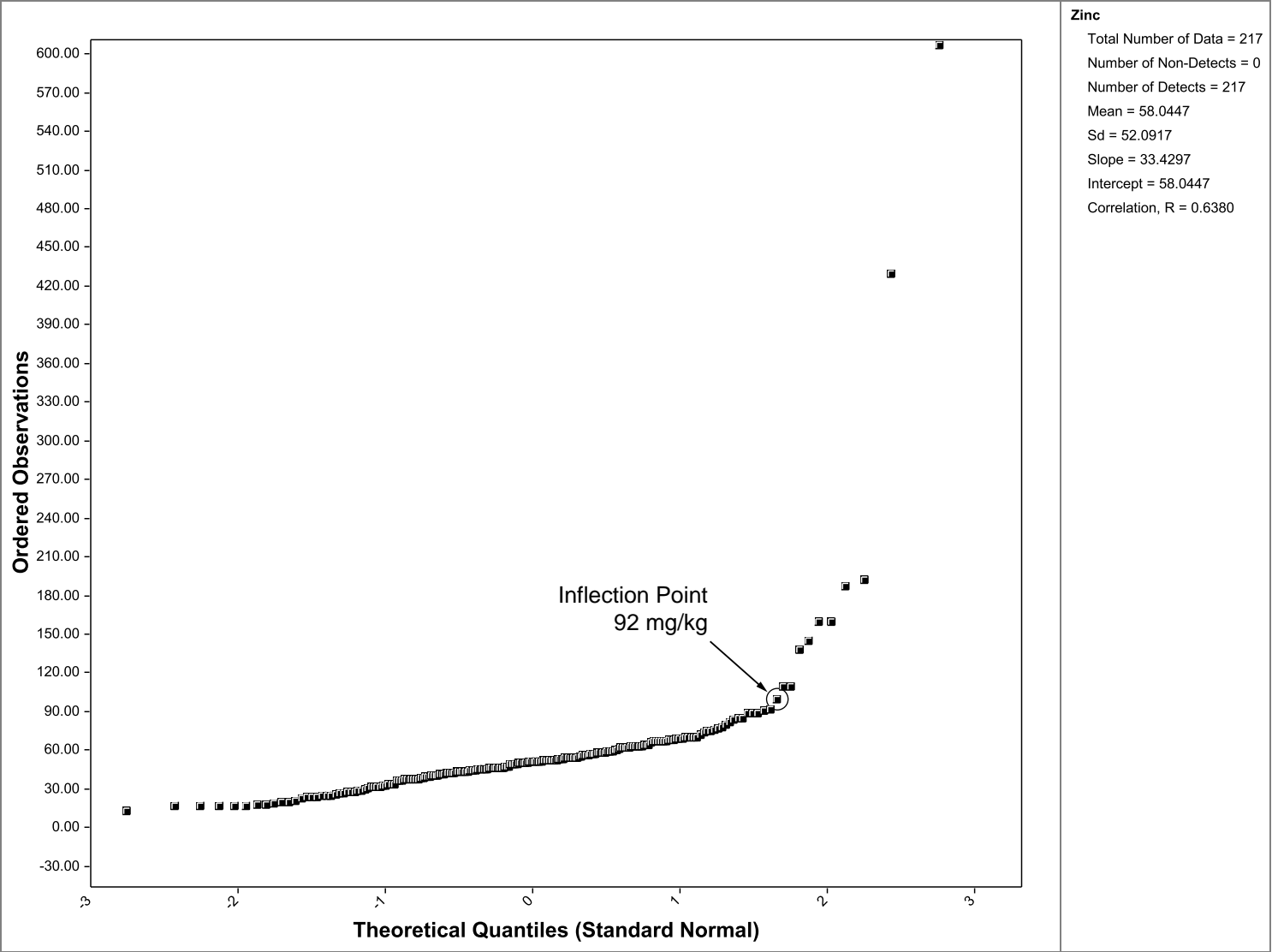
Attachment B-2  
Normal Probability Plot for Vanadium



Attachment B-2  
Lognormal Probability Plot for Vanadium

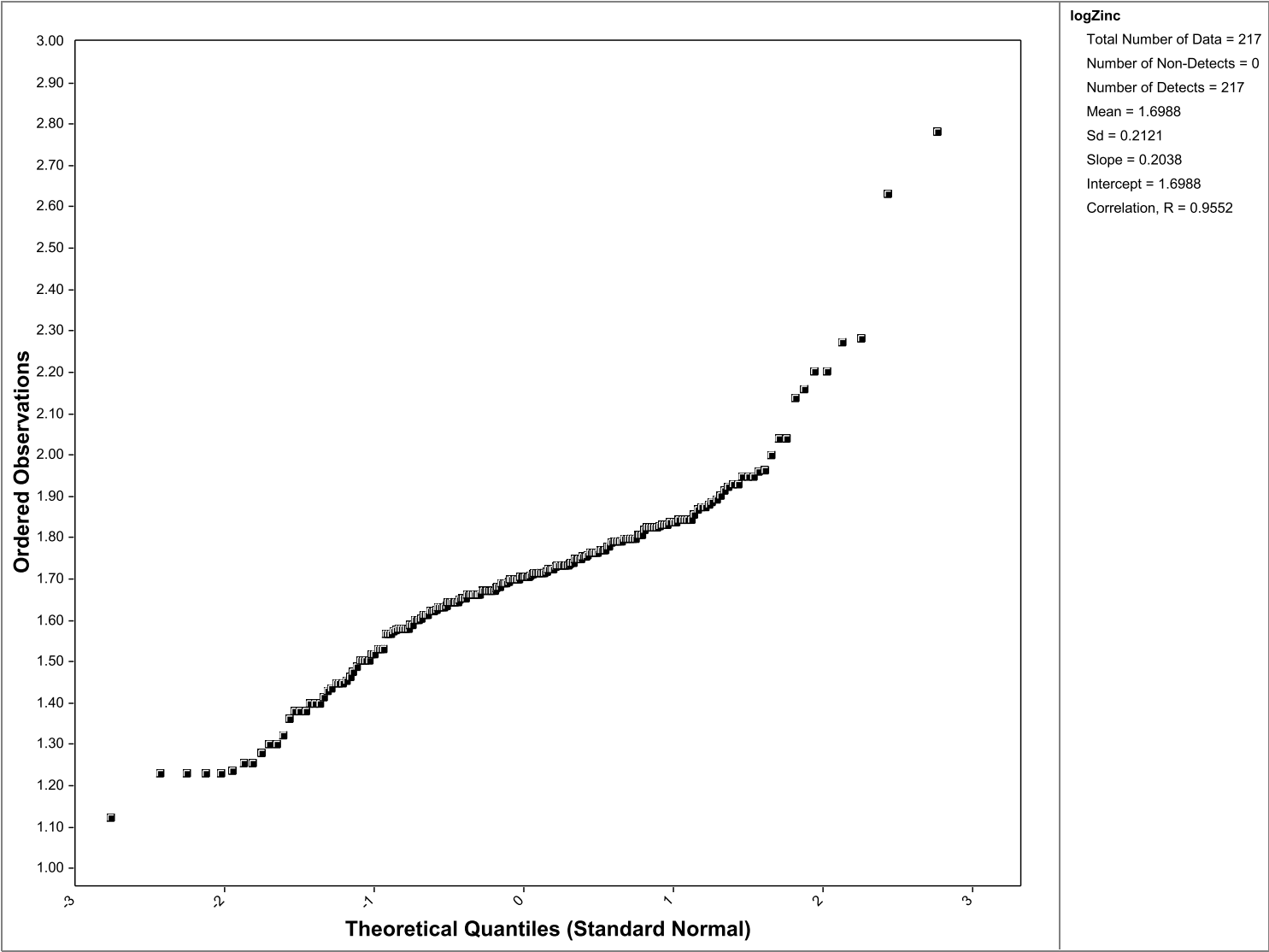


Attachment B-2  
Normal Probability Plot for Zinc





Attachment B-2  
Lognormal Probability Plot for Zinc



**ATTACHMENT B-3**  
**ProUCL 4.00.04 OUTPUT -- ROSNER'S OUTLIER TESTS**  
Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

**Rosner's Outlier Test for Barium**

Mean 92.28  
Standard Deviation 33.06  
Number of data 217  
Number of suspected outliers 1

| # | Mean  | sd    | Potential outlier | Obs. Number | Test value | Critical value (5%) | Critical value (1%) |
|---|-------|-------|-------------------|-------------|------------|---------------------|---------------------|
| 1 | 92.28 | 32.99 | 190               | 105         | 2.962      | 3.629               | 4                   |

For 5% Significance Level, there is no Potential Outlier

For 1% Significance Level, there is no Potential Outlier

**ATTACHMENT B-3**  
**ProUCL 4.00.04 OUTPUT -- ROSNER'S OUTLIER TESTS**  
Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

**Rosner's Outlier Test for Chromium, Total**

Mean 12.95  
Standard Deviation 4.797  
Number of data 219  
Number of suspected outliers 1

| # | Mean  | sd    | Potential<br>outlier | Obs.<br>Number | Test<br>value | Critical<br>value (5%) | Critical<br>value (1%) |
|---|-------|-------|----------------------|----------------|---------------|------------------------|------------------------|
| 1 | 12.95 | 4.786 | 32.1                 | 27             | 4.001         | 3.632                  | 4.003                  |

For 5% Significance Level, there is 1 Potential Outlier  
Therefore, Observation 32.1 is a Potential Statistical Outlier

For 1% Significance Level, there is no Potential Outlier

**ATTACHMENT B-3**  
**ProUCL 4.00.04 OUTPUT -- ROSNER'S OUTLIER TESTS**  
Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

**Rosner's Outlier Test for Cobalt**

Mean 7.951  
Standard Deviation 2.351  
Number of data 203  
Number of suspected outliers 1

| # | Mean  | sd    | Potential outlier | Obs. Number | Test value | Critical value (5%) | Critical value (1%) |
|---|-------|-------|-------------------|-------------|------------|---------------------|---------------------|
| 1 | 7.951 | 2.345 | 16                | 129         | 3.432      | 3.612               | 3.984               |

For 5% Significance Level, there is no Potential Outlier

For 1% Significance Level, there is no Potential Outlier

**ATTACHMENT B-3**  
**ProUCL 4.00.04 OUTPUT -- ROSNER'S OUTLIER TESTS**  
Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

**Rosner's Outlier Test for Lead**

Mean 9.385  
Standard Deviation 18.7  
Number of data 186  
Number of suspected outliers 1

| # | Mean  | sd    | Potential outlier | Obs. Number | Test value | Critical value (5%) | Critical value (1%) |
|---|-------|-------|-------------------|-------------|------------|---------------------|---------------------|
| 1 | 9.385 | 18.65 | 157               | 41          | 7.915      | 3.585               | 3.955               |

For 5% Significance Level, there is 1 Potential Outlier  
Therefore, Observation 157 is a Potential Statistical Outlier

For 1% Significance Level, there is 1 Potential Outlier  
Therefore, Observation 157 is a Potential Statistical Outlier

**ATTACHMENT B-3**  
**ProUCL 4.00.04 OUTPUT -- ROSNER'S OUTLIER TESTS**  
Former Pechiney Cast Plate, Inc. Facility  
Vernon, California

**Rosner's Outlier Test for Vanadium**

Mean 32.46  
Standard Deviation 9.579  
Number of data 217  
Number of suspected outliers 1

| # | Mean  | sd    | Potential outlier | Obs. Number | Test value | Critical value (5%) | Critical value (1%) |
|---|-------|-------|-------------------|-------------|------------|---------------------|---------------------|
| 1 | 32.46 | 9.557 | 70                | 39          | 3.928      | 3.629               | 4                   |

For 5% Significance Level, there is 1 Potential Outlier  
Therefore, Observation 70 is a Potential Statistical Outlier

For 1% Significance Level, there is no Potential Outlier